STORM WATER MANAGEMENT PROGRAM

(revised 5/17/05)

Carpinteria Unified School District



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1.0 INTRODUCTION

1.1 Regulatory Background

This Storm Water Management Program (SWMP) is required under U.S. Environmental Protection Agency (U.S. EPA) Phase II storm water regulations, promulgated under the Federal Clean Water Act. These regulations require Carpinteria Unified School District (CUSD or District) to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit by April 30, 2004 as a "non-traditional small MS4" (Municipal Separate Storm Sewer System). The permit covers storm water discharges associated with CUSD's storm sewer system and requires CUSD to develop a SWMP and report annually on its progress. This SWMP outlines activities for the implementation period of September 15th of each year beginning the first year after acceptance of this Program, for the life of the permit.

In 1990, U.S. EPA promulgated rules establishing Phase I of the NPDES storm water program. The Phase I program for MS4s requires operators of "medium" and "large" MS4s – that is, those that generally serve populations of 100,000 or greater to implement a storm water management program as a means to control polluted discharges from these MS4s. The Storm Water Phase II Rule extends coverage of the NPDES storm water program to "small" MS4s including federal and state facilities, but takes a slightly different approach to developing and implementing the storm water management program.

Polluted storm water runoff is often transported to MS4s and ultimately discharged into local waterways (rivers, streams, lakes, and bays) without treatment. U.S. EPA's Storm Water Phase II Final Rule establishes an MS4 storm water management program intended to improve the nation's waterways. Common storm water pollutants include oil and grease from roadways and parking lots, pesticides from lawns, sediment from construction sites, and trash. These pollutants are deposited into nearby waterways, impacting beneficial uses of the resource and interfering with the habitat for fish, other aquatic organisms, and wildlife.

The California State Water Resources Control Board (SWRCB) regulates discharges to State Waters as established by the Porter-Cologne Water Quality Control Act of 1962, regulated under Title 23 of the California Code of Regulation (CCR). The Regional Water Quality Control Board (RWQCB), Central Coast Region 3 administers the U.S. EPA NPDES permit program for Carpinteria Unified School District. This SWMP for CUSD has been prepared in response to requirements of the General Phase II Small MS4 Activities Storm Water Permit. The General Permit is provided in Appendix A of this Program.

The General Permit requires applicable dischargers to prepare and implement a SWMP in order to:

- Reduce the discharge of pollutant to the "maximum extent practicable"
- Protect water quality
- Satisfy the appropriate water quality requirements of the Clean Water Act and RWQCB's Program

1.2 Purpose of the SWMP

This document has been developed to comply with U.S. EPA Phase II NPDES requirements promulgated under the Clean Water Act and complies with the General Permit. CUSD functions as a non-traditional small MS4, per Attachment 3 of the General Permit. This SWMP covers all CUSD facilities.

The purpose of the SWMP is to:

- Identify pollutant sources potentially affecting the quality and quantity of storm water discharges.
- 2. Provide Best Management Practices (BMPs) for municipal and construction activities to reduce contamination in storm water.
- Provide measurable goals to assess the effectiveness of BMPs that are designated to reduce the discharge of the pollutants into the storm drain system and associated waterways.
- 4. To establish a comprehensive effort by CUSD to help prevent the discharge of pollutants to surface water bodies by limiting the role storm water runoff plays as the vehicle for pollution.
- 5. Storm Water pollution will be considered in all aspects of CUSD's activities and multiple departments within the school district will coordinate efforts to meet the water quality objective outlined within the General Permit.

It is hereby acknowledged that this document serves as a 'dynamic' program that is expected to be altered and improved upon throughout the life of the permit. The document will evolve as the District better understands what methodologies and practices prove most effective.

1.3 Storm Water Working Group

A Storm Water Working Group (SWWG) was created so that representatives for campus departments could provide input into development and implementation of the SWMP. SWWG members are available for contact from anyone at the CUSD schools. They represent the 8 schools (6 school sites) within the Carpinteria Unified School District. The members are as follows:

- Lucinda Abbott Assistant Superintendent, Business Services CUSD
- Tricia Price Curriculum Coordinator CUSD, Principal Summerland Elementary, Principal Carpinteria Family School (Canalino)
- Bob Keatinge Director of Secondary Curriculum, Principal Carpinteria Middle School
- Jim Campos Director of Elementary Curriculum, Principal Main Elementary School
- Dan McFarlane Maintenance and Operations Supervisor
- Michelle Tollett Storm Water Permit Consultant

This Storm Water Working Group has *extremely* limited resources. These resources include both time and money constraints. Any workload generated by the SWMP must be absorbed by existing staff that are already overworked. It is in the best interest of the District and other agencies to work cooperatively to meet Measurable Goals with the resources available. CUSD has established relationships with the County of Santa Barbara, City of Carpinteria, Santa Barbara Channelkeeper, University of California Santa Barbara LTER (Long Term Ecological Research) Program, California Coastal Commission, Community Environmental Council and various other organizations that may aid this effort. The District will establish exactly which programs suit their needs; determine the other existing programs that the District may participate in the future and add to the SWMP in the Annual Updates. This will be an ongoing effort beginning in Year 1. The cooperation with the County's and City's SWMPs will not be pursued until their SWMPs have been approved and accepted by the RWQCB.

This limitation in resources can prove to create a stronger, more standardized type of storm water agenda within the Santa Barbara County communities. It is believed that such cooperation allows for a streamlined approach to storm water management, especially concerning the educational BMP components within the SWMP. In addition, watershed areas cross many municipalities; therefore this informal group effort may be the best 'pollution solution' for many localities.

Note: For the pursposes of this SWMP, the term "years 1-5", should be interpreted as "the year the permit is accepted through the life of the permit, which is usually five years".

2.0 SITE INFORMATION

2.1 Facility Description

CUSD is a public school district, located within the City of Carpinteria and County of Santa Barbara, about 90 miles north of Los Angeles. The population of CUSD is approximately 3,210; this includes students, faculty and staff, which compose the 'public' served by the General Permit. However, it must be noted here that CUSD has a "declining enrollment" status; the population is expected to decrease year-by-year. Currently, there are 4 elementary schools (Aliso, Canalino, Main and Summerland), 1 middle school (Carpinteria), 1 high school (Carpinteria), 2 alternative schools (Foothill Alternative (grades 3-8) and Rincon Continuation (grades 9-12)) and 1 District Office (located on the Canalino Elementary School premises).

In addition to the campuses mentioned above CUSD owns 3 properties outside Carpinteria City limits. These properties were originally purchased to be used as future school sites. Due to budget constraints and residential dissent, the schools were never built. Two of these properties are vacant lots, known as the 'Whitney Property' and the 'Toro Canyon Property'. The Whitney Property runoff is all via undisturbed, natural vegetation into an undisturbed natural drainage area. The Toro Canyon Property is situated in such a way that most storm water will pool onsite and percolate into the soil. The third property is known as the 'Bailard Property', which has 4 small single-family rental homes and one septic tank. Septic tank inspections have been added as a Best Management Practice in the Illicit Discharge and Elimination Minimum Control Measures. The locations of the CUSD properties are shown on Figure 1 in Appendix B.

CUSD MS4 borders two other MS4 jurisdictions: County of Santa Barbara and the City of Carpinteria. These entities will each have their own SWMP. Carpinteria High School and Summerland Elementary School border Santa Barbara County. All other schools are well within the City of Carpinteria limits. All schools within CUSD produce runoff to one of the following bodies of water: Carpinteria Creek, Franklin Creek, Santa Monica Creek or the Pacific Ocean. The average annual rainfall in the Carpinteria/Santa Barbara area is approximately 17.9 inches¹.

¹ NOAA website [http://www.nwsla.noaa.gov/climate/citynorms.htm] and [http://www.santabarbaraliving.com/aboutcarp.htm]

Carpinteria USD School Addresses

• Aliso School	Aliso School, K-6 4545 Carpinteria Ave. Carpinteria, CA 93013 Principal: Donna Stuart	Phone:(805) 684-4539 FAX: (805) 566-4759
Canalino School	Canalino School, K-5 1480 Linden Avenue Carpinteria 93013 Principal: Sally Green	Phone: (805) 684-4141 FAX: (805) 684-3384
Carpinteria High School,	Carpinteria High School, 9-12 4810 Foothill Road Carpinteria, CA 93013 Principal: Dan Bryant Asst. Principal: Gerardo Cornejo	Phone: (805) 684-4107 FAX: (805) 566-5952
Carpinteria Middle School	Carpinteria Middle School, 7-8 5351 Carpinteria Avenue Carpinteria, CA 93013 Principal: Bob Keatinge	Phone: (805) 684-4544 FAX: (805) 566-3839
Foothill/Rincon High ■ School	Foothill/Rincon High School, 9-12 4698 Foothill Road Carpinteria, CA 93013 Principal: Steve Powell	Phone: (805) 684-3277 FAX: (805) 566-9707
<u>Main School</u> ●	Main School, 2-6 5241 Eighth Street Carpinteria 93013 Principal: Dr. Jim Campos	Phone: (805) 684-4153 FAX: (805) 566-0563
Summerland School •	Summerland School, K-6 135 Valencia Post Office Box 460 Summerland, CA 93067 Principal: Tricia Price	Phone: (805) 969-1011 FAX: (805) 969-1524

2.2 Facility Operation

CUSD employs maintenance, custodial, and grounds staff for day-to-day operations. This includes building maintenance (cleaning, painting, and repairs), completion of department work requests, daily cleaning of common buildings, grounds maintenance, small construction jobs, and various repair and maintenance activities. District staff and outside contractors perform electrical, plumbing, utility, roofing, painting, asphalt repairs, and concrete work.

In addition to the maintenance operations, CUSD may produce waste streams from the following educational activities: Autoshop, Woodshop, Photolab, Chemistry Labs, and Biology Labs.

3.0 POTENTIAL SOURCES OF POLLUTION

Controllable storm water runoff from the CUSD area is generated by three main land use components: student/faculty/staff use of school property (wear and tear, trash, and vehicles) educational activities (autoshop, agriculture class) and light industrial activities (building and bus maintenance). Five of the CUSD properties operate their own storm drainage systems, which consist of a combination of curb and gutter facilities, curb inlets, underground pipelines, and bubblers draining to the nearest street, drainage ditch or concrete reinforced drainage ditch. Most of the CUSD properties were built before storm water became a nationwide concern therefore waste discharges flow untreated directly into storm sewer systems instead of being placed in the sewage treatment system. The limitation to CUSD's impacts on storm water runoff relies on a combination of structural and behavioral BMPs. Storm water discharges are largely of a non-point source character, so public education and participation are considered important components in the overall program of pollution prevention.

This Program targets the type of storm water pollution most commonly encountered in school district facilities. Runoff from impervious areas carries a multitude of contaminants including litter road oils, pet waste, sediment (from construction sites, playing fields, agricultural areas and parking lots) to our precious waterways. Nutrient runoff composed of phosphorus and nitrogen can lead toeutrophication of water bodies impairing aquatic life through algal blooms and temperature changes. It has also been observed that litter is commonly found wherever people have access to drainage courses. The Program targets these concerns by implementing various controls, the effectiveness of which will be evaluated as the Program is implemented.

The BMPs to address the pollutant sources and activities described on Table 5.3a will be developed and implemented as described in the Sections 5.3 and 5.6.

4.0 MINIMUM CONTROL MEASURES

4.1 Minimum Control Measures and BMPs

"Minimum Control Measures" is the term used by the U.S. EPA for the six MS4 program elements aimed at achieving improved water quality. The Final Rule specifies that a Phase II SWMP must include BMPs for the following six minimum measures:

- Public Education and Outreach on Storm Water Impacts
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Construction Site Storm Water Runoff Control
- Post-construction Storm Water Management in New Development and Redevelopment
- Pollution Prevention and Good Housekeeping for Facilities Operation and Maintenance

The goal of the SWMP is to reduce the discharge of pollutants and to identify activities or structural improvements that help reduce the quantity and improve the quality of the storm water runoff. BMPs have been developed for the SWMP to reduce the discharge of pollutants to the storm drain system. BMPs include treatment controls, operating procedures, and practices to control site runoff, spills and leaks, sludge or waste disposal, or drainage from raw material storage. BMPs will be updated as appropriate to comply with any additions or changes to NPDES permit requirements.

4.2 How to Use BMPs to Meet Permit Requirements

The BMPs described in Section 5.0 will be implemented by CUSD staff and outside contractors. Whenever CUSD staff or contractors perform work at District school sites, procedures outlined for each relevant BMP, or other proven technique that reaches the same goal, must be used in order to ensure compliance with storm water discharge regulations.

CUSD has already initiated some of the BMPs listed in Section 5.0 of this SWMP. In some cases the measure has not been formally documented as a written plan or program. The SWMP will document these existing BMPs and outline implementation of additional BMPs. Full development and implementation of BMPs will be completed over a five-year period.

5.0 DEVELOPMENT AND IMPLEMENTATION OF BMPS

The BMPs will be implemented by CUSD students, faculty, and staff, and consultants. Implementation will be the responsibility of specific campus groups and departments.

5.1 Public Education And Outreach On Storm Water Impacts

A Phase II storm water plan must incorporate a public education program that educates the "public" (students, faculty, and staff) on the impacts of storm water discharges on water bodies and the steps that they can take to reduce pollutants in storm water runoff. The District's intent is to institute a public education and outreach program that generates greater support for the program by providing successive, tangible, applied teaching on the impacts of storm water to water quality. As the public gains a greater understanding of the reasons why it is necessary and important to comply with the program, they will become more aware of the personal responsibilities expected of them and others in the "community". The goals of the plan are to 1) educate the public on the local water bodies and how to protect those water bodies; 2) change behaviors that negatively impact watersheds; and 3) promote public involvement in watershed stewardship. The District will develop internal BMPs as well as utilize current, on-going programs from the County of Santa Barbara Project Clean Water (ie. brochures) that address the requirements of this minimum control measure. The District anticipates close coordination of our program with the current program of the County of Santa Barbara Storm Water Management Program (CSBSWMP) and the City of Carpinteria. They must perform a similar function in the Santa Barbara County Area and this will result in a more effective communication link with the public. This coordination will begin once the CSBSWMP and City of Carpinteria SWMP is approved, as it will prove too costly in revision time for the District to identify a BMP in this Program to meet the MCM if said CSBSWMP program is pending approval. Therefore, we have planned the Education and Outreach and Public Participation MCMs with existing personnel and programs; with exception to the Brochures and Fliers BMP, as SBCSWMP has completed preliminary fliers and they are available for use.

Four BMPs listed 5.1A-5.1D have been chosen to meet the MCM to the MEP. They are as follows:

- 5.1A Staff Training
- 5.1B Brochures and Fliers
- 5.1C Classroom Education
- 5.1D Website

GENERAL PERMIT REQUIREMENTS:

- Implement a public education program to distribute educational materials to students, faculty, and staff or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.
- Non-traditional MS4s that discharge into medium and large MS4s may integrate public education and outreach programs with the existing MS4 public education and outreach programs.

BMP 5.1A Staff Training

In order to reach both the Maintenance and Faculty departments that potentially discharge pollutants to waterways, the District will ensure that the appropriate personnel will be educated about the requirements of the General Permit and this Program, as it applies to non-traditional small MS4's. The staff training programs will contain a combination of written assessments, presentations, and videos. Topics covered will include the impacts of storm water discharges on water bodies and the steps that they can take to reduce pollutants in storm water runoff. In addition, Permit Requirements, BMP Implementation and Methods, Measurable Goals, Progress Effectiveness and Reporting will be discussed. A question & answer session will result in problem solving strategies.

The District Training will be held each September, before the rainy season begins, by a District Supervisor, contractor, or other similar qualified personnel. The training will include 2 distinct groups of employee base. Maintenance, Grounds, Custodial and Transportation Personnel will function as the representative "Maintenance Group". The Administration, Teachers, Teacher's Aid's or similar positions will function as the representative "Faculty Group".

The "Maintenance Group" will be shown a 20 minute video produced by Excal Visual titled "Storm Water Pollution Prevention, Storm Warnings, Everyday Best Management Practices, Employee Training". The "Faculty Group" will be shown the 20 minute "After the Storm" video produced by the U.S.EPA and The Weather Channel. If more appropriate training videos are identified these will be replaced and noted in the annual report.

The Training will be documented with a sign-in sheet and specific problems will be noted and applicable BMPs will be assessed for implementation. The Program will be updated and BMPs employed immediately when feasible. If issues of non-compliance exist, the RWQCB will be notified in writing within 30 days.

The effectiveness of the Training will be quantified by amount of problems solved and the pre/post assessment quizzes.

BMP 5.1B Brochures and Fliers

Brochures and fliers for all ages of the general public and specific audiences will be obtained from CSBSWMP or downloaded at no cost off the internet, and used for public distribution in the District and school offices. Stickers with the District's hotline phone number will be attached to the back of the fliers. Brochures will be distributed at the District and school administrative offices, as outreach to parents and students. The automotive and agriculture classes will also receive copies of the BMP Guidebook for Vehicle Maintenance Facilities and an "appropriate" agricultural handout respectively. The "appropriate" agricultural handout will be identified in the first year. The District will order 35% of the handouts in Spanish. Each year the District will make available for distribution 325 brochures (for autoshop and agriculture classes) and 200 miscellaneous handouts (for the administrative offices).

Due to declining enrollment, the District does not foresee an increase in the number of brochures needed each year. If the District decides to increase the number of brochures and handouts ordered, this will be noted in the subsequent Annual Reports.

This parameter will be measured by the number of brochures, coloring books, and miscellaneous handouts distributed.

List of Currently Available Storm Water Publications

Creekside Concerns	Brochure
Healthy Creeks and Ocean Depend on You	.Brochure
The Ocean Begins at Your Door	.Brochure
Storm Water Pollution Prevention Public Participation Opportunities	.Flier
Proper Maintenance Practices for Your Business	Brochure
BMP Guidebook for Vehicle Maintenance Facilities	.Handout
Water and Me	.Coloring Book
Clean Water, Everybody's Business	Brochure
After the Storm	. Brochure

BMP 5.1C Classroom Education

With the goal of educating its students on the structure and dynamics of watersheds and groundwater as well as their contamination by polluted storm water, the District will reinforce and expand upon its curriculum in these areas. The District is targeting grades 6, 7, 8, and 9 with lessons, presentations, videos, and field trips. The District believes that watershed, groundwater, and storm water curriculum is developmentally appropriate for students of these grades. Furthermore, these topics dovetail with California State Science Content Standards for grades 6, 8, and 9. Lastly, repetition and reinforcement of

topics is considered sound teaching pedagogy, especially in these intellectually and ethically formative years.

The District agrees to the following:

Education BMP: 6th grade (Aliso, Canalino, Main, Summerland, Carpinteria Family Elementary Schools): Earth Science: Creek Kids Environmental Education Series through Community Environmental Council (CEC):

- o In class presentation on local watersheds and the water cycle
- Field trip to Arroyo Burro Watershed Resource Center
 - Learn to read watershed maps
 - Sources of water pollution
 - Solutions to water pollution storm water included
- o Carpinteria Creek What is a healthy creek?
 - o Tour local creek site
 - Conduct creek survey
 - o Pollution indicators
 - o Creek clean up How did this trash get here?
- In class presentation on water pollution What can you do?
 - o Water drainage patterns on campus and where that water goes

Student effectiveness is assessed using a pre and post quiz in the Green Kids Series.

Note: In addition, 6th grade also participates in Carpinteria State Park Dunes Service Learning Project, where they learn to preserve and maintain the sand dunes at the State beach. Also, 6th grade uses parts of the Mountains to Sea Watershed Curriculum provided by Project Clean Water of Santa Barbara County.

Education BMP 7th grade (Carpinteria Middle School): To reinforce facts and concepts introduced to students in 6th grade, a storm water video will be shown during a 20-minute assembly to Carpinteria Middle School's 7th graders or within each science classroom. The video will be followed by discussion and a pre/post written assessment of student understanding. An appropriate video will be acquired prior to the first year by the General Permit consultant and the District. The program will be maintained throughout the life of the General Permit.

Education BMP 8th grade (Carpinteria Middle School): During the 8th grade's State-mandated Science Content Standards study of solutions, acids, and bases, teachers will devote one lesson to the study of storm water contamination of surface and groundwater. The lesson will be conducted by a representative

from the Santa Barbara County Department of Water Resources as part of their Project Clean Water program. The presentation makes use of a groundwater system model that is exposed to surface water pollution. Teachers will supplement the presentation with discussion and print material that encourage surface water pollution prevention strategies for the individual and community. A pre/post written assessment of student understanding will be given. The program will be maintained throughout the life of the General Permit.

Education BMP 8th grade elective. The From Shore to Sea 8th grade elective has an intensive watershed, groundwater, and water-pollution unit. Utilizing the Jason XIV "From Shore to Sea" curriculum, Project Cleanwater's "Mountain to Sea" curriculum, the California Coastal Commission's "Waves, Wetlands, and Watersheds" curriculum, as well as local resources, the course studies local watersheds, their long-term monitoring, groundwater dynamics, water contamination, and restoration efforts of the local salt marsh, creeks, and native plant and animal species. Instruction includes, but is not limited to: lectures, classroom activities, video, internet projects, water sampling of Carpinteria Creek, field trips to the Carpinteria salt marsh, and guest lecturers from UC Santa Barbara, Santa Barbara County Department of Water Resources, Carpinteria Valley Water District, the National Park Service, Community Environmental Center (CEC), and the Carpinteria Creek Coalition (CCC). Assessment of student understanding is written, performance, and project-based. The class is offered to 20 students per semester, reaching approximately 0.5% of the CUSD population.

Education BMP 9th grade (Carpinteria High School): Earth Science: The California State Earth Science Content Standards will be augmented by a storm water and water quality computer learning segment offered to all 9th graders in their required Computer Operations course. The computer-based activity will be developed by high school computer and science faculty and will access approved watershed, groundwater, storm water, and water quality websites with interactive learning potential, including the District's storm water program website. Assessment will include student work from the activity. The program will be maintained throughout the life of the General Permit.

This parameter will be measured by the number of students who participate in the aforementioned storm water education programs. Assessment will include pre and post factual, conceptual, and behavioral written components.

BMP 5.1D Web Site

The District will share a Storm Water website, developed and hosted by its environmental contractor, CJSeto Support Services, which serves school districts throughout Southern California. This website will be linked to the District's website. The website will provide local as well as national storm water information. The website will be featured during years one through five (for the life of the permit). It is

planned to post a minimum of three articles on storm water pollution prevention each month with new articles added quarterly. Articles include Storm Water Related Volunteer Opportunities, Public Participation Opportunities, Car Care for Do-It Yourselfers in English and Spanish, Home Maintenance Tips, Home Repair and Remodeling, Landscaping and Gardening, Painting and Application of Solvents and Adhesives, and Pest Control Tips. Links to other storm water related websites will be made available, including the CSBSWMP (Project Clean Water), the County of Ventura's Website, California Stormwater Quality Assiciation, California Coastal Commission, State Water Resources Control Board and the Environmental Protection Agency's website. This parameter will be measured by the number of storm water related articles posted and the number of visits to that site on an annual basis.

Table 5.1 presents selected BMPs for this minimum control measure. The table identifies the current BMP as well as the justification for these BMPs, their implementation details, the implementation year, measurable goals, the progress measurement and the effectiveness measurement (where possible). The progress and effectiveness measurements will be quantitative or qualitative depending on the type of BMP. This document is a dynamic document and the quantitative measurements may be updated as the Program takes shape over time.

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.1A Staff Training: Engage District faculty about the storm water permit/program, pollution abatement & water quality issues	Educating faculty and staff on storm water and water quality practices will help promote better awareness and compliance.	Provide "Maintenance Group" and "Faculty Group" with one annual applicable training on storm water.	Yr 1: Meeting with District officials to determine which faculty and staff positions must participate in storm water education.	Meeting (s) to be held and recorded each September. Attendees will sign- in.	Education goals determined, format and time frame established. This will be completed within 90 days of approval of the SWMP.
5.1A Staff Training: Engage District faculty about the storm water permit/program, pollution abatement & water quality issues	Educating faculty and staff on storm water and water quality practices will help promote better awareness and compliance.	Provide "Maintenance Group" and "Faculty Group" with one annual applicable training on storm water.	Yr 2-5: Provide official "Maintenance Group" and "Faculty Group" with annual storm water education.	Meeting (s) held and recorded each September. Attendees will signin.	Education goals met. Problem areas solved. Changes will be recorded and reported in Annual Report. Pre/Post assessment quizzes given.
5.1B Brochures and Fliers: Brochures, fliers, coloring books, and handouts promoting Storm Water Quality. Some handouts will be in Spanish	Education materials available to students and parents will raise awareness of storm water quality. Materials provided to autoshop and ag students.	Order brochures for a minimum of 300 students (9.3% of the public) and 200 brochures throughout the school offices.	Yr 1: Research appropriate agriculture brochure; Order 325 brochures for classes, 35% in Spanish (113).	Identify ag brochure. Order all brochures.	Number of brochures distributed.

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.1B Brochures and Fliers: Brochures, fliers, coloring books, and handouts promoting Storm Water Quality. Some handouts will be in Spanish	Education materials available to students and parents will raise awareness of storm water quality. Materials provided to autoshop and ag students.	Handout education materials to a minimum of 300 students (9.3% of the public) and 200 brochures throughout the school offices.	Yr 2-5: Provide said public with brochures.	Number of brochures, coloring books, and miscellaneous handouts produced.	Number/percent of storm water materials distributed each year. Does it meet 9.3% of the population?
5.1C Classroom Education: Storm water education in classes	students. 5.1C Classroom Educating students Uphold education as on storm water and outlined in section		Yr 1: Identify video to be shown at the 7 th grade assembly. Logistics for assembly. All other grades 6 th , 8 th , 9 th will be taught storm water immediately.	Number of students taught. 7 th grade assembly video and logistics determined.	Pre and post written assessments given.

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.1C Classroom Education: Storm water education in classes	Educating students on storm water and water quality practices will help promote better awareness.	Uphold education as outlined in section 5.1C for: 6 th grade (June each year, 225 students, 7% of public) 7 th grade (Nov-Dec each year, 225 students, 7% of public) 8 th grade (Nov-Dec each year, 225 students, 7% of public) 8 th grade elective (1 semester/year, 15 students, .5% of public 9 th grade (Nov-Dec each year, 300 students, 10.7% of public)	Yr 2-5: Storm water taught as planned each year.	Number of students taught.	Pre and Post Assessment Quizzes given.

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.1D Web Site: Post storm water related information on the District's website	Local updated information will raise awareness of the storm water program.	Post and maintain a link about the District's storm water management plan on the District's web page. The link shall be present at all times and updated quarterly. Provide a minimum of 3 articles on storm water pollution prevention and update every quarter.	Yr. 1: Develop and post storm water information on the District's website. Update quarterly or more often if necessary.	Number of storm water pollution prevention articles posted.	Number of storm water related articles posted and the number of visits to the site on an annual basis. Site visits should include BMP 5.1C for 9 th grade Earth Science class.
5.1D Web Site: Post storm water related information on the District's website	Local updated information will raise awareness of the storm water program.	Post and maintain a link about the District's storm water management plan on the District's web page. The link shall be present at all times and updated quarterly. Provide a minimum of 3 articles on storm water pollution prevention and update every quarter.	Yr. 2-5: Maintain storm water information on the District's website. Update quarterly or more often if necessary.	Number of storm water pollution prevention articles posted.	Number of storm water related articles posted and the number of visits to the site on an annual basis. Site visits should include BMP 5.1C for 9 th grade Earth Science class.

5.2 Public Involvement and Participation

A Phase II storm water program permittee shall encourage the public (students, faculty & staff) to be involved in the storm water program. The public can provide valuable input and assistance to the storm water management program. Benefits include broader public support for the program and increased resources in the form of student/staff volunteers. The District will benefit from coordination of our program with the current program of the County of Santa Barbara Storm Water Management Program and City of Carpinteria SWMP, which are performing similar functions for the County of Santa Barbara and City of Carpinteria, respectively.

The District has chosen 5 BMPs to meet the Public Involvement and Participation MCM. They are as follows:

- 5.2A Storm Water Working Group Meetings with Public Participation
- 5.2B Storm Drain Stenciling
- 5.2C Student Participation during Student Education
- 5.2D Public Hotline
- 5.2E Student Garden Projects

GENERAL PERMIT REQUIREMENTS:

At a minimum, comply with State and local public notice requirements when implementing a
public involvement participation program.

BMP 5. 2A Storm Water Working Group Meetings with Public Participation

Public involvement is an excellent way to inform students, faculty, staff and parents about storm water impacts in addition to gaining support for the proposed storm water management program. The Storm Water Working Group will meet bi-annually. One meeting will be closed session, for the 'official' CUSD members of the Storm Water Working Group (see Section 1.3). The general public/parents will be invited to participate at the second Storm Water Working Group biannual meeting to provide input on the Storm Water Management Program. These meetings will be posted on the District's Storm Water website as well as District and school offices.

The SWWG closed session meeting will be held in September of each year as a BMP 'refresher' before the ensuing rainy season. The SWWG public meeting will be held in May or June after the rainy season to solicit the public's input about aspects of the program that work well or don't work well. Surveys will be conducted at these meetings. The surveys will be used to learn how knowledgeable citizens are about storm water pollution and how much is known about the District's SWMP. Public comments will be

incorporated in the annual reports. The effectiveness of this program will be measured by the number of attendees at meetings, as well as the quantity/quality of the survey responses.

BMP 5.2B Storm Drain Stenciling

The District plans to develop an active program of stenciling storm drain inlets in highly visible areas advising the public that dumping is not allowed. The District currently has <u>63</u> storm drains suitable for stenciling. A stenciling schedule and area map of storm drains will be developed as part of the program to determine the percentage of storm drain inlets that are stenciled. This program will be performed by the District Maintenance Staff and renewed every few years because of gradual loss of markings due to weathering. By stenciling storm water quality messages adjacent to storm drain inlets that are visible to the public, public awareness will be raised about the impacts of pollutants entering the storm drain system. This parameter will be measured by the number of storm drains stenciled each year, and how many remain to be stenciled.

Here is a count of the "paved" drains (drains with pavement area sufficient for stenciling):

Aliso Elementary: 19 drains

Canalino Elementary: 13 drains

Carpinteria High: 10
Carpinteria Middle: 16

Main: 0

Summerland Elementary: 5

Foothill/Rincon: 0

BMP 5.2C Student Participation during Student Education

The District participates in a "hands-on" program to promote storm water awareness and participation by the students. These programs, including field trips, are outlined in the Public Education Section BMP 5.1C. This BMP satisfies both the Education and the Participation component through lessons, field trips, interactive learning and question & answer sessions.

BMP 5.2D Public Hotline

To compliment enforcement effort, the District will have a hotline for reporting illicit discharges. The Brochures used as BMP 5.1B will be utilized to inform the public what illicit discharges are, the harm they can cause, and how to contact appropriate personnel. The District's hotline will be provided as a sticker on the backs of the brochures.

During year one, the District will establish an illicit discharge hotline through their contractor, CJSeto Support Services. The District hotline will have illicit discharge protocol trained phone reception staff.

Phone reception staff will log the type of storm water pollution (illicit discharge, illegal dumping or failed construction site runoff controls, etc.). The phone reception staff will call the appropriate response personnel, either Maintenance, Custodial or Environmental Contractor / Fire Department. Effectiveness of this parameter will be measured by the number of illicit discharges and failed construction site runoff controls detected through the hotline.

BMP 5.2E Student Garden Projects

Sediment, organic wastes, over-watering and garden chemicals contribute to the degradation of our watersheds. This urban runoff can be controlled through a combination of education and BMPs. The District currently participates in a student garden and composting project at each of the six schools. Approximately 200 students and 10 teachers participate in this project. This is 6.5% of the current population. Due to declining enrollment this number may vary; the District feels this is a significant amount of the student population participating in one program, therefore an appropriate area to include storm water education/participation.

Per this Program, the District opts to include storm water discussion to the students during garden activities. The storm water discussion will cover topics including sediment and erosion control, responsible pesticide, herbicide and fertilizer use, and choosing drought-resistant natives in landscaping projects as these topics pertain directly to the health of insects, fish and waterways.

The District will emphasize a hands-on approach to teaching sediment and erosion control, as well as gardening practices such as pest control through organic methods. The District will NOT allow the students to participate in hands-on use of any pesticides or herbicides on school grounds. The District will also order and utilize the California Native Plant Society Manual for School Garden Projects. Students participate in some structural BMPs such as container plantings and grassy berms for sediment containment.

Table 5.2 presents selected BMPs for this minimum control measure. The table identifies the current BMP as well as the justification for these BMPs, their implementation details, the implementation year, measurable goals, the progress measurement and the effectiveness measurement (where possible).

Carpinteria Unified School District (CUSD) Table 5.2 - Public Involvement and Participation

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
BMP 5.2A: Public Participation at Storm Water Working Group Meetings	Public involvement is an excellent way to inform citizens about storm water impacts in addition to gaining support for the proposed storm water management program.	One closed session meeting and one session for the General Public will be held for Storm Water Working Groups to provide input on the Storm Water Management Program.	Yr. 1-5: One closed session SWWG meeting in September. One SWWG meeting will be opened to the public each year. Meeting will be held in April or May after the rainy season.	Number of SWWG meetings held as closed session and as open to the public and the number of attendees at meetings.	Survey at public meeting to learn how knowledgeable citizens are about storm water pollution and how much is known about the District's SWMP.
BMP 5.2B: Storm Drain Stenciling	Public awareness will be raised that dumping is not allowed.	Stencil storm drain inlets in highly visible areas advising the public that dumping is not allowed.	Yr. 1: A stenciling map schedule will be made. All drains will be stenciled.	Number of drains stenciled.	Number of drains stenciled.
BMP 5.2B: Storm Drain Stenciling	Public awareness will be raised that dumping is not allowed.	Stencil storm drain inlets in highly visible areas advising the public that dumping is not allowed.	Yr: 2-5: Touch-ups will be made to existing stencils.	Number of drains stenciled.	Number of drains stenciled.
BMP 5.2C: Student Participation during Student Education	Promote storm water awareness and participation by the students during storm water education for a "complete hands-on experience".	Maintain BMPs as outlined in Section 5.1C.	Yr. 1-5: Maintain BMPs as outlined in Section 5.1C.	Program is maintained.	Each storm water education/participation will be logged and reported annually.

Carpinteria Unified School District (CUSD) Table 5.2 - Public Involvement and Participation

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
BMP 5.2D: Public Hotline	To report any Illicit discharges.	Document calls received per month. Promote use of hotline through printed materials and website.	Yr. 1: Hotline established through CJSeto Support Services, immediately following hotline installation phone reception staff will be trained. Add hotline number to website and brochures when available.	Program Implemented Log what type of storm water pollution (illicit discharge or failed construction site runoff controls) the caller is concerned about.	Number of calls reported.
BMP 5.2D: Public Hotline	To report any Illicit discharges.	Document usage of calls per month. Promote use of hotline through printed materials and website.	Yr. 2: The District hotline will have illicit discharge protocol trained staff.	Log what type of storm water pollution (illicit discharge or failed construction site runoff controls) the caller is concerned about.	Number of calls reported.
BMP 5.2E: Student Garden Projects	Provide a hands-on experience with responsible gardening practices.	Maintain student gardens program with approximately 6.5% of population participating.	Year 1: Obtain CNPS guide to native plantings in school gardens. Year 1-5: The program is a year-long effort beginning in September of each year.	Amount of students within program.	The school currently reaches 6.5% of the population through gardening. Follow-up surveys of gardening program will reflect upon its success.

5.3 Illicit Discharge Detection and Elimination

Illicit discharge is any discharge to a municipal separate storm sewer system that is *not composed entirely of storm water*. Examples of illicit discharges include raw sewage, car wash waste water, oil and vehicle fluids, laundry waste water, and household toxics. Illicit discharges enter the system through either direct connections (e.g. waste water piping either mistakenly or deliberately connected to the storm drain) or indirect connections (e.g., infiltration into the storm drain system from a cracked sewer line or spills that migrate into a storm drain inlet). Exceptions to illicit discharge are discharges from NPDES permitted authorized sources and discharges from fire-fighting activities.

Illicit discharges are considered "illicit" because a municipal separate storm sewer system is not designed to accept, process, or discharge such non-storm water activities. Untreated discharges that contribute high levels of pollutants, including heavy metals, toxics, oil and grease, solvents, nutrients, viruses, and bacteria to receiving water bodies result from illicit discharge. Pollutant levels from these illicit discharges have been shown in EPA studies to be high enough to significantly degrade receiving water quality and threaten aquatic, wildlife, and human health.

The District's approach to the Illicit Discharge Minimum Control Measure will be to develop a plan which addresses: 1) storm water drainage mapping, 2) elimination of illicit discharges by implementing BMPs, training, inspection, and monitoring, 3) implementation of policies, procedures, and enforcements, and 4) public awareness outreach. The following plan outlined by the District has been developed using the EPA's Fact Sheet 2.5: Storm Water Phase II Final Rule: Illicit Discharge Detection and Elimination Minimum Control Measure as a guide.

The District has chosen the following BMPs:

- 5.3A Storm Water Infrastructure Map
- 5.3B Illicit Discharge Detection and Elimination: Authorized Non-Storm Water Discharges
- 5.3C <u>Illicit Discharges: Unauthorized Non-Storm water Discharges; BMP Implementation, Inspection, and Documentation</u>
- 5.3D Illicit Discharge Procedures and Training
- 5.3E <u>District Policies</u>
- 5.3F Public Awareness

GENERAL PERMIT REQUIREMENTS:

The Permittee must:

- Develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at 40 Code of Federal Regulations (CFR) 122.26(b)(2) into the regulated Small MS4 (General Permit, D.2.c.1).
- Develop, if not already completed, a storm sewer system map showing the location of all outfalls and the names and locations of all waters of the U.S that receive discharges from those outfalls (General Permit, D.2.c.2).
- To the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, non-storm water discharges into the school district properties and implement appropriate enforcement procedures and actions (General Permit, D.2.c.3).
- Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to the system that are not authorized by a separate NPDES permit (General Permit, D.2.c.4).
- Inform students, faculty, and staff of the hazards that are generally associated with illegal discharges and improper disposal of waste (General Permit, D.2.c.5).
- Address the following categories of non-storm water discharges or flows (i.e., authorized nonstorm water discharges) only where they are identified as significant contributors of pollutants to the Small MS4 (General Permit, D.2.c.6):

1	Water Line Flushing	10	Irrigation Water
2	Landscape Irrigation	11	Springs
3	Diverted Stream Flows	12	Water From Crawl Space Pumps
4	Rising Ground Waters	13	Footing Drains
5	Uncontaminated Ground Water Infiltration	14	Lawn Watering
6	Uncontaminated Pumped Ground Water	15	Individual Residential Car Washing
7	Potable Water Discharges	16	Riparian Habitat and Wetlands Flow
8	Foundation Drains	17	De-Chlorinated Swimming Pool Discharges

9 Air-Conditioning Condensation

5.3A Storm Water Infrastructure Map

In compliance with General Permit, D.2.c.2, comprehensive 'Final Draft' storm water infrastructure maps are currently available and included with this SWMP as Appendix B.

The storm drain maps will aid the District in targeting outfalls with dry weather flows and other suspicious discharges for more in-depth investigation of storm drains. These maps will be used to assess illicit connections and to prevent materials from entering water bodies in the event of illegal dumping. These maps will help coordinate management activities to track storm drain maintenance.

Maintenance of the storm drain system will be performed by the District maintenance, custodial crews and Western States Environmental (or other such contractor).

Year 1: In addition to the location of outfalls, the names and locations of the Carpinteria Watershed and its receiving waters will be added. Problem outfalls will be noted.

Year 2: The District will liaison with the City of Carpinteria and the County of Santa Barbara to review their infrastructure maps. This will prove beneficial for all parties as a complete overview of the entire storm drain system may be realized. In addition, if Illicit Connections exist they will be discovered. This parameter will be measured by yearly update, inventory of problem outfalls and prioritization of sites for inspection. Any problem drains will be logged and reported in the Annual Report.

5.3B Illicit Discharge Detection and Elimination: Authorized Non-Storm Water Discharges

This BMP addresses General Permit requirement D.2.c.6, as listed above. The implementation of BMP 5.3B will involve 1) performing an Illicit Source Survey to identify possible sources of non-storm water discharges, and 2) identifying appropriate BMPs to eliminate the significant discharge. The tables below show the BMP for each <u>authorized</u> non-storm discharge listed in the General Permit. The first table includes BMPs for identified non-storm discharges, the second table includes non-storm discharges needing further research within the District (to be performed Year 1), and the third table includes all non-storm discharges not applicable to the District.

The table below shows identified BMPs that will be used for authorized non-storm water discharges identified at the District.

Authorized Non-Storm Water Discharges: BMPs

Permit Category		
Number	Authorized Non-Storm Water Discharges	ВМР
1	Water Line Flushing	The District has never needed to perform water line flushing because the pipes are small resulting in fast flow rates which keep sediment from accumulating. The system is self-flushing. However, if there is ever an emergency water quality issue, the Carpinteria Valley Water District will perform the water line flushing. The District uses sodium bisulfate to de-chlorinate the water (per conversation Omar Castro, May 5, 2005)
4	Rising Ground Waters	CUSD does not have problems with rising ground water. If it were to occur, all contaminants will be kept clear of groundwater.
5	Uncontaminated Ground Water Infiltration	CUSD does not have problems with ground water infiltration. If it were to occur, all contaminants will be kept clear of groundwater.
7	Potable Water Discharges	Discharged onto lawns to percolate.

Below are the authorized non-storm water discharges from the General Permit list that need further research during year one. A BMP will be chosen for each of these discharges found to exist. The most appropriate BMPs will be selected from the California Storm Water Quality Association's (CASQA) *Storm Water Best Management Practices Handbooks*, found on the internet at:

<u>http://www.cabmphandbooks.com/</u>, and the resulting selections will be submitted to the Water Board in the Annual Report.

Authorized Non-Storm Water Discharges: Further Research Necessary

Permit Category Number	Authorized Non-Storm Water Discharges	Illicit Source Survey/Further Research
2	Landscape Irrigation	Illicit source survey performed year one.
6	Uncontaminated Pumped Ground Water	Illicit source survey performed year one.
10	Irrigation Water	Illicit source survey performed year one.
12	Water From Crawl Space Pumps	Illicit source survey performed year one.
13	Footing Drains	Illicit source survey performed year one.
14	Lawn Watering	Illicit source survey performed year one.
16	Riparian Habitat and Wetlands Flow	Illicit source survey performed year one.

The table below shows non-storm discharges that either do not exist at the District or have negligible contributions.

Authorized Non-Storm Water Discharges: Non-Applicable to District

Permit Category Number	Authorized Non-Storm Water Discharges NOT APPLICABLE TO DISTRICT	REASON FOR NON-APPLICABILITY
3	Diverted Stream Flows	District does not divert stream flows.
8	Foundation Drains	District does not have foundation drains.
9	Air-Conditioning Condensation	Not a significant contributor.
11	Springs	District does not have any springs.
15	Individual Car Washing	District prohibits car washing.
17	De-Chlorinated Swimming Pool Discharges	District does not have swimming pools.

5.3C Illicit Discharges: Unauthorized Non-Storm Water Discharges; BMP Implementation, Inspection, and Documentation

Unauthorized Non-storm water discharges are discharges into the storm drain system and receiving water bodies that can occur at all times of the year. The types of pollutants that can be introduced as a result of non-storm water discharges include sediment, soaps, oils, chlorine, pesticides, fertilizers, paints, petroleum products, and various maintenance products. The State Water Resources Control Board of California has determined that non-storm water discharges are significant polluters and therefore, should be addressed in the SWMP. Through training, District maintenance personnel will learn Source Control and Materials Management BMPs listed under the NPDES National Menu of BMPs. These topics will include Pet Waste Collection, Automobile Maintenance, Vehicle Washing, Illegal Dumping Control, Landscaping and Lawn Care, Pest Control, Parking lot and Street Cleaning, Septic System Controls, Storm Drain Cleaning, Alternative Discharge options for chlorinated water, Alternative Products, Hazardous Materials Storage and Materials Management.

A preliminary detailed list of Unauthorized Non-Storm Water Discharges can be found in Pollutant Activities/Sources list below. This list is a 'dynamic list' to be updated once formal storm water training and the Illicit Source Survey has occurred. This list will be revised using the input from all participants of the 'Maintenance Group' and 'Faculty Group' (see Section 5.1A) and from the Illicit Source Survey. The Illicit Source Survey will include items listed in the District's Hazardous Materials Business Plan and Integrated Pest Management Plan.

Once illicit discharge sources are found through the Illicit Source Survey (Year 1), the selected BMPs must be implemented and subsequently inspected to ensure they are performing as designed. Each of these actions will be documented, to illustrate that progress is being made to eliminate illicit connections and discharges. Quarterly documentation will be performed to measure BMP effectiveness. This will

include the number of outfalls screened, number of complaints received and corrected, and the number of discharges eliminated. This BMP satisfies General Permit requirement D.2.c.4.

Parking lot car wash fundraisers have been halted and will not be offered as a source of fundraising. The policy BMP listed in 5.3E will include enforcement for non-storm water discharges (pending passing the School District Governing Board and Employee Barganing Unit (Union)). This parameter will be measured by the number of participants at the training sessions conducted that covered non-storm water discharges. The effectiveness will be measured through a quiz at the annual training.

Inspection of BMPs will continue for the duration of the permit and will be discussed in detail during the Annual Trainings and SWWG meetings outlined in this SWMP.

A Pollutant Activity/Source Table follows:

Pollutant Activity/Sources - Unauthorized Non-Storm Water Discharges

Activity/Source	Pollutants of Concern	ВМР	Responsible District Personnel /
Activity/Source		(to be evaluated & implemented Year 1)	Training received
Building Maintenance	Wash water, paint chips,	Good Housekeeping - Annual Building	
(washing, graffiti	cleaning products, dirt and	Maintenance will adhere to BMPs, sweeping/dry	Custodial & Maintenance
abatement)	sediment	cleaning area after use	Personnel
Chemical spills	Various cleaning compounds,	Emergency Spill Response will be handled by	Custodial 9 Maintanana
	diesel, paint, hazardous	CJSeto Support Services or Carpinteria Fire	Custodial & Maintenance
	material, vehicle fluid.	Department	Personnel
Construction activities	Concrete, drywall, paint and	Construction activities <1 acre will follow	
	sediment	Construction BMPs listed in Section 5.4 of this	Maintenance Personnel
		Program	
Food service	Wash water, food residue, oil	Good Housekeeping - Daily wash water and food	
operations	and grease	service wastes are disposed of into a sanitary	Custodial Personnel
		sewer system or into the solid waste bins	

Pollutant Activity/Sources - Unauthorized Non-Storm Water Discharges

A oficity/Course	Pollutants of Concern	ВМР	Responsible District Personnel /
Activity/Source		(to be evaluated & implemented Year 1)	Training received
Ground maintenance	Green waste, fuel, oil,	Good Housekeeping - Daily maintenance of	
	pesticides, herbicides,	Grounds will follow comprehensive BMP list, will	
	sediment	include use of pesticides, herbicides and fertilizer	
		on clear, dry weeks. Low watering, minimize	Grounds Personnel
		runoff, watering less during rainy season,	
		composting, erosion control. Comprehensive list	
		to be made Year 1, Section 5.6	
Impervious areas	Increased flows and pollutant	Parking Lot and Street Cleaning –Biannual	Grounds Personnel
	loading	parking lot sweeping	Grounds Personner
Irrigational runoff	Chloramines, fertilizers,	Landscaping and Lawn Care - Irrigational runoff	
	pesticides	BMP (Year 1, Section 5.6). Includes minimal	Grounds Personnel
		watering and minimal fertilizer use.	
Litter and debris	Litter and debris	Good Housekeeping - Litter and Debris BMPs	
		(Year 1, Section 5.6). Dry sweeping, covers on	Grounds Personnel
		trash cans.	
Loading and unloading	Petroleum products,	Materials Management – Good Housekeeping	
areas	fertilizers, pesticides,	(Year 1, Section 5.6). Proper Training and	Custodial, Grounds & Maintenance
	herbicides, cleaning	Storage Procedures, included in comprehensive	Personnel
	solutions, paint	BMP list.	

Pollutant Activity/Sources - Unauthorized Non-Storm Water Discharges

A ativity/Cauras	Pollutants of Concern	ВМР	Responsible District Personnel /	
Activity/Source		(to be evaluated & implemented Year 1)	Training received	
Outdoor storage of raw	Sand, soil, pesticides,	Materials Management BMP – berms and or	Custodial, Grounds & Maintenance	
materials	fertilizer, paint, solvents, fuel	overhead coverings will be utilized	Personnel	
Painting (indoor)	Paint or rinse water (oil and	Materials Management and Rinsate Abatement –	Maintenance Personnel	
	water based), paint thinner	during painting projects	Maintenance Personner	
Parking lot runoff	Oil/grease, litter, heavy	Good Housekeeping – Weekly Inspections	Grounds Personnel	
	metals		Grounds Personner	
Roof runoff	Particulate matter and	Good Housekeeping – Inspection before rainy	Maintenance Personnel	
	associated pollutants	season (September)	Maintenance r ersonner	
Sewer line blockages	Raw sewage	Emergency response will be carried out by		
and seepage		Maintenance Department and Carpinteria	Custodial, Grounds & Maintenance	
		Sanitary District	Personnel	
		(805) 684-7214		
Trash storage areas	Organic material, hazardous	Good Housekeeping - Daily cleanup		
	materials	Hazmat is kept in closed labeled lockers,	Grounds Personnel	
		disposed of to a permitted facility once per year.		
Vehicle and equipment	rinsate / washwater	Vehicle Washing Rinsate Abatement - CUSD and		
washing		Carpinteria City will coordinate washings on an	Transportation Personnel	
		approved pervious surface on the City's property,	Transportation Personner	
		year 1		

Pollutant Activity/Sources - Unauthorized Non-Storm Water Discharges

A ativity/Course	Pollutants of Concern	ВМР	Responsible District Personnel /	
Activity/Source		(to be evaluated & implemented Year 1)	Training received	
Utility line maintenance	Chloramines, chlorine,	Emergency repair will be done by Grounds or		
and repairs	sediment, adhesive cements,	Maintenance. If needed an outside contractor		
(water/irrigation)	primers	may be solicited for assistance.	Consumed & Maintanana Banaana	
		This discharge is considered an 'authorized'	Grounds & Maintenance Personnel	
		discharge; however, any emergency situations		
		will be documented and reported.		
Pet feces	Coliform bacteria	Pet Waste Collection	Custodial Staff	
Carpet cleaning waste	Cleaning products, soap	Rinsate Abatement - Dispose of wastewater into	Custodial Staff Maintananae Staff	
water		treated sewer line	Custodial Staff ; Maintenance Staff	

5.3D Illicit Discharge Procedures and Training

Development of reporting procedures and staff training on how to address illicit discharges will help ensure that illicit discharges will be discovered and enforcement is followed through consistently. Currently, the procedure for reporting an illicit discharge of an unknown substance is to contact the Santa Barbara County Fire Department Hazardous Materials Unit and the District's environmental contractor. Once the nature and type of substance is determined, either the Fire Department or the environmental contractor will make arrangements to clean it up, following procedures as outlined in CUSD's Hazardous Materials Business Plan.

If the substance is determined to be non-hazardous, the District maintenance and custodial personnel will clean it up. Additionally, any clean-up actions will be documented in the annual report including the number of outfalls screened, any complaints received and corrected, and the number of discharges and source activities eliminated. Training will be coordinated and conducted by the District's environmental consultant.

The storm drain system is designed to drain rain and authorized discharges only. The District's monitoring objective is to investigate outfalls and determine if dry weather flows are from an uncontaminated source, such as sprinkler water or air conditioning condensate or from a pollutant source, such as an industrial discharge or sanitary sewer overflow.

All District maintenance and custodial personnel will call the Sanitary Sewer District if a sewer line overflows.

Written procedures will be developed for staff to follow in the event that illicit discharges are discovered. In house training of all District maintenance and custodial employees will occur annually for a minimum of one hour. All applicable employees (approximately 27 employees) should be trained by the first year. This parameter will be measured by the number of applicable employees trained annually. This BMP satisfies General Permit Section D.2.c.5.

5.3E District Policies

The District will evaluate existing in-house policies that address illicit discharges, and implement new policies, when necessary to ensure a comprehensive program of oversight and enforcement. By developing new or additional policies the District can target the illegal discharge of illicit substances into the storm sewer system. A comprehensive policy must be in place that prohibits the intentional and unintentional discharge of pollutants into the storm drain system and establishes enforcement, notification, and remediation requirements. A review for existing policies will be performed, as well as updating existing development requirements to include more storm water measures. This will be a lengthy process, as the School District Governing Board, the Employee Barganing Unit (Union), and other

applicable entities will become involved and must agree on procedure. During the first year of the program, staff will evaluate existing policy requirements and research policies and ordinances that have been successfully implemented in other local agencies. By the end of year two, the District will have adopted appropriate policies to meet the stated objectives. This parameter will be measured by whether or not a comprehensive policy that establishes enforcement, notification, and remediation requirements was developed.

This BMP satisfies Section D.2.c.3 of the General Permit.

5.3F Public Awareness

To compliment regular inspections, the District will establish public outreach in the form of:

- illicit discharge hotline;
- illicit discharge informational brochure with hotline number included;
- District Storm Water Website, referenced in Section 5.1D; and
- Staff Training, outlined in Sections 5.1A, 5.3D and 5.6B.

The District's storm water website, training, and brochures will be utilized to inform the public: 1) what illicit discharges are, 2) the harm they can cause, and 3) how to contact appropriate personnel to report problems.

During year one, the District will have established an illicit discharge hotline, distributed informational brochures, and developed the District's Storm Water website. The effectiveness of the public outreach will be measured by the number of calls received and the time elapsed between a hotline notification and the resolution of the problem. These calls will be logged and documented in order to evolve policies and incorporate "lessons learned" into the SWMP. This BMP is listed below in Table 5.3 and addresses General Permit requirement D.2.c.5, listed above.

Table 5.3 presents selected BMPs for this minimum control measure. The table identifies the current BMP as well as the justification for these BMPs, their implementation details, the implementation year, measurable goals, the progress measurement and the effectiveness measurement (where possible). These BMPs combine to satisfy Section D.2.c.1 of the General Permit.

Carpinteria Unified School District (CUSD Table 5.3 Illicit Discharge Detection and Elimination

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.3A Storm Water Infrastructure Map: Understanding the District's Storm Water System	Mapping the storm water drainage system is the first step to detecting and addressing illicit discharge.	Map indicating outfalls, names, and locations of local watersheds and receiving waters.	Yr. 1: First draft of map completed. Edits and updates will be performed. Yr. 2-5: Liaison will be made with City of Carpinteria to ascertain receiving water bodies.	Map updated.	Updated map submitted to Water Board in Annual Report.
5.3B Illicit Discharge Detection and Elimination: Authorized Non- Storm Water Discharges	Understanding that Authorized discharges are not completely innocuous will aid in the elimination of pollutants such as chlorine, bacteria and sediment.	Complete research on Authorized source areas, create BMPs for associated discharges.	Yr 1: Illicit Source Survey will include survey for Authorized source areas. At this time the District is unsure about the existence or location of wells, crawl space pumps, footing drains etc. (as listed in 5.3B). Once determined the District will choose associated BMPs. Yr. 2-5: Maintain BMPs established in Year 1.	All Authorized discharge sources identified and BMPs chosen.	BMPs established. Any Authorized discharges noted through quarterly visual observations.

Carpinteria Unified School District (CUSD Table 5.3 Illicit Discharge Detection and Elimination

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.3C Illicit Discharges: Unauthorized Non Storm Water Discharges	Implementation of BMPs, Inspection and Documentation of Unauthorized discharges will aid in the elimination of illicit discharges. Reducing and eliminating sources of illicit discharges and non-storm water discharges prevents storm water pollution from ever reaching waterways.	Locations of problem areas identified and sources of these problems found. BMPs for all sources not known at this time will be listed. A comprehensive listing of BMPs for associated activities created.	Yr. 1: Illicit source survey of the District's buildings and grounds will be used to identify any problems and locate the sources of these problems. Corrective BMPs identified from The California Storm Water BMP Handbook. This survey will identify non-storm water discharges that are significant contributors. Yr. 2-5: Implement BMPs and phase in environmentally friendly products when possible to replace sources listed in Table 5.3a.	Illicit source survey complete. Report listing problem areas, sources of these problems, and corrective BMPs to be implemented.	Illicit source survey report completed and submitted to Water Board in Annual Report.

Carpinteria Unified School District (CUSD Table 5.3 Illicit Discharge Detection and Elimination

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.3D Illicit Discharge Procedures and Training	Training District personnel on procedures for dealing with an illicit discharge event will increase response time and effectiveness, thereby minimizing impacts to waterways.	Identify appropriate District staff for training.	Yr. 1: Write procedures, including step-by-step approach and applicable telephone numbers. Develop incident reporting logs.	Procedures written. Appropriate District staff trained and identified. Incident reporting logs established.	Reporting logs will describe incidents, responses, and response times. Procedures will be updated based upon experiences and reported in Annual Report to Water Board.
5.3E District Policies: Policies and Enforcement to Stop Illicit Discharge	Establishing clear District policies for preventing and stopping illicit discharges will greatly reduce or eliminate storm runoff pollution.	District can target illegal discharge of illicit substances into the storm sewer system through enforcement, notification, and remediation. Follow procedures outlined in HazMat Business Plan. Develop incident reporting logs.	Yr. 1: Evaluate existing policies for illicit discharges. Yr. 2: Update with new policies and incorporate input from the City of Carpinteria and the County of Santa Barbara into the District's Illicit Discharge Policies.	Policy is evaluated. Liaison with City of Carpinteria and the County of Santa Barbara to develop policies further.	District staff has sufficient enforcement authority to quickly address illicit discharges.
5.3F Pubic Awareness: Hotline Brochures Website Staff Training	Awareness promotes public input and assists the District with illicit discharge enforcement.	Hotline created, number fixed to the brochures (Section 5.1B), Website created (Section 5.1D) and Staff Training (Sections 5.1A, 5.3D, 5.6B)	Yr. 1: The District will have established an illicit discharge hotline.	Hotline is operational and hotline number posted on educational brochures distributed in 5.1B. All phone calls and results will be logged.	Number of illicit discharges reported and corrected. Time lapsed between a hotline complaint and its resolution.

5.4 Construction Site Storm Water Runoff Control

Construction sites, with their proportionally large areas of disturbed native soil, can contribute significant amounts of polluted storm runoff to the storm drain system. Sediment is the primary pollutant with runoff rates at construction sites being 10 to 20 times greater than those of agricultural land and 1,000 to 2,000 times greater than those of forest lands. During a short period of time, construction sites can contribute more sediment to streams than can be deposited naturally during several decades. The resulting siltation and the contribution of other pollutants from construction sites can cause physical, chemical, and biological harm to our nation's waters. To address this problem, the District's SWMP is adopting BMPs which comply with section D.2.d of the NPDES General Permit.

Although the Construction and Post-Construction MCMs are required by the General Permit, the District does not anticipate any construction activities within the next 5 years (or the life of the permit). In fact, the District is experiencing such dire financial circumstances (budget constraints, declining enrollment, increased environmental compliance costs, decreased funding through grants) they may have to close one of their schools.

The District agrees to comply with the Construction and Post-Construction BMPs. However, the District must have a reasonable time in which to create policies. This is meant to say that the District will await the acceptance of the County of Santa Barbara and City of Carpinteria SWMP's before the District creates new policies. Using this approach, the District can assure that the policies created will be at least, if not more, stringent than the surrounding permitted entities. If policy is created simultaneously, it will be another "reinventing the wheel" situation, which may cost the District more money in revision and meeting time. Once the surrounding permitted entities SWMPs are accepted, the District can then use their ordinances for their required 'Boilerplate' construction BMPs. This will be accomplished through the life of the permit, as outlined below.

CUSD has chosen the following BMPs to meet the General Permit Requirments:

5.4A District Policies

5.4B Site Plan Review and Plan Check

5.4C Site Inspection and Enforcement

5.4D Public Hotline

GENERAL PERMIT REQUIREMENTS:

Develop and implement the following:

- An ordinance or other regulatory mechanism (A Board policy or regulation) to require erosion
 and sediment controls, as well as sanctions or other effective mechanisms, to ensure compliance
 to the extent allowable under State or local law (General Permit, D.2.d.1).
- Requirements for construction site operators to implement appropriate erosion and sediment control BMPs (General Permit, D.2.d.2).
- Requirements for construction site operators to control waste such as discarded building
 materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site
 that may cause adverse impacts to water quality (General Permit, D.2.d.3).
- Procedures for site Program review that incorporate considerations of potential water quality impacts (General Permit, D.2.d.4).
- Procedures for receipt and consideration of information submitted by the public (General Permit, D.2.d.5).
- Procedures for site inspection and enforcement of control measures (General Permit, D.2.d.6).

5.4A District Policies

The District's approach to meeting this Minimum Control Measure will be to establish clear District policies for containing sediment and silt migration from construction sites, and submit these policies to the District Governing Board for adoption. These polices will include a review of construction plans and inspection procedures to ensure compliance, as further discussed in Sections 5.4B and 5.4C. This section, "District Policies" addresses how the District will comply with General Permit Requirements D.2.d.1, D.2.d.2, and D.2.d.3 listed above.

The District will work with the SWWG and CJSeto Support Services to review existing policies and add new policies to generate a "District Construction and Post-Construction Site Policies and Procedures" document; this will ensure the mandates of the NPDES General Permit are met. To make this document comprehensive, the District will collaborate with the City of Carpinteria and the County of Santa Barbara to incorporate new SWMP ordinance requirements into its policies. Furthermore, the District policy will address clauses and sanctions to be built into the contracts for construction to ensure Permit compliance along with chains of command between construction contractors and the District for Permit enforcement. This will allow the District to respond quickly to any construction site runoff issues and greatly assist with pollution prevention and monitoring. The construction contract clauses will list required construction site waste control procedures and erosion prevention BMPs, thereby addressing General Permit requirements D.2.d.2 and D.2.d.3 listed above.

The District Policy will be at least as stringent as the surrounding permitted MS4 (ie. City of Carpinteria or County of Santa Barbara). CUSD's policy document will evolve over the next five years (or the life of the permit) to incorporate changes in local and county ordinances and "lessons learned" from advisement provided from other permitted entities engaged in construction activities. These measures and their time frame for development are listed in Table 5.4 under BMPs 5.4A.

5.4B Site Plan Review and Plan Check

As of March 10, 2004, projects one acre and larger are required to obtain a Construction Activities Storm Water General Permit from the State Water Resources Control Board to comply with National Pollutant Discharge Elimination System (NPDES) permitting requirements. If the construction encompasses more than one acre, a Storm Water Pollution Prevention Plan (SWPPP) will be required by the District as a provision of the State's General National Pollutant Discharge Elimination System Storm Water Permit for Construction Activities. The SWPPP shall include drainage plans illustrating sedimentation and erosion-control measures and structures, and the directions of all site drainage are to be submitted as a part of final construction plans to be approved by the Division of State Architects.

Construction activity disturbing less than one acre will also require a permit if it is part of a larger common plan of development or sale disturbing a total of one acre or greater, or is individually designated for permit coverage by the Regional Water Quality Control Board (RWQCB) based on a threat to water quality.

During the third year, the District will develop procedures that will identify 1) appropriate staff to check construction plans, and 2) projects requiring coverage under the General Permit for Construction Activities and thereby necessitating the development of a SWPPP. During the third year, the District will develop required BMPs for construction activities and post-construction BMP installation and maintenance.

For projects greater than one acre, the District will work with CJSeto Support Services and construction contractors to develop the SWPPP. Although the General Construction Permit is meant to be self-implemented, the RWQCB will be consulted and given the opportunity to review the SWPPP as a means of assuring compliance with the Construction General Permit. This BMP will address water quality issues before construction begins. The effectiveness of this BMP will be measured by the site monitoring, inspection, and enforcement BMPs discussed in the following Section 5.4C and in Section 5.5 (post-construction BMPs). Additionally, the site plan review procedures will be submitted to the Water Board in the third year Annual Report. These measures are listed in Table 5.4, items 5.4B, and they address General Permit requirements D.2.d.4, listed above.

5.4C Site Inspection and Enforcement

The District will hire CJSeto Support Services or other qualified consultants to be monitors/inspectors on District projects thereby ensuring that the SWPPP and District policies are being followed. CJS will work with the SWWG and local/county inspectors to develop and implement written procedures including: checklists, reports, daily logs, site inspections, and violation notification procedures. The District will notify construction site contractors of site inspection and enforcement policies along with notification that construction will be halted until SWPPP violations are corrected. The site monitors will attend preconstruction meetings.

Enforcement will also be enhanced by District policies developed in Section 5.4A which require clauses and sanctions in the site contractor's contract ensuring Permit compliance. Inspections will continue until projects are complete (through the life of the construction permit). Inspectors will be trained by the SWRCB erosion and sediment control meetings, online BMPs listed in the National BMP Menu for Phase II NPDES projects and through liaison with City/County Storm Water inspectors.

During the third year, the procedures will be written. In subsequent years, the District will review policies and upgrade them based upon lessons learned during monitoring and in collaboration with local and county ordinance changes. This parameter will be measured by tracking how many violations were found at each construction site and how they were addressed. The lessons learned from inspection violations will be incorporated back into the site review policies developed in Section 5.4B. These measures are listed in Table 5.4, items 5.4C, and they address General Permit requirements D.2.d.4, listed above.

5.4D Public Hotline

To compliment inspection efforts, the District will have a hotline for reporting failed construction site runoff controls and non-storm water discharges from construction sites. For the public's and District's convenience, this hotline will be the same hotline as used for reporting illicit discharges and will be established in year one. The hotline will be advertised by signage at each construction site. The effectiveness of the hotline will be measured by number of calls received and the time elapsed between a hotline notification and the resolution of the problem. This BMP is listed below in Table 5.4. and addresses General Permit requirement D.2.d.5, listed above.

Table 5.4 presents selected BMPs for this minimum measure. The table identifies the name of the BMP, its justification, measurable goals, year it will be implemented, progress measurement, and effectiveness measurement.

Carpinteria Unified School District (CUSD) Table 5.4 Construction Site Runoff Control

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.4A District Policies: Reviewing, Enhancing and Developing Formal Policy to Prevent Construction Site Runoff	Establishing clear District policies for containing sediment and silt migration from construction sites will greatly reduce or eliminate storm runoff pollution.	Evaluate existing policies for erosion and sediment control at construction sites. Examine the City of Carpinteria and the County of Santa Barbara's SWMP ordinances and incorporate them into the District's Policy.	Yr. 3: Evolve District Policy with any new ordinance requirements and incorporate any "lessons learned" from previous construction activities advisement from City or County.	Policy written and ready to submit to the District Governing Board.	District staff has sufficient enforcement authority to quickly address construction site runoff issues.
5.4A District Policies: Incorporating Local and County Ordinances into District Policies to Prevent Construction Site Runoff	Enhancing the District's policies with newly developed local and county SWMP ordinances will increase the effectiveness of construction site pollution runoff prevention.	Submit policy to the District Governing Board.	Yr. 4: Board adoption of a policy for erosion and sediment control for construction sites.	Policy established and adopted by Governing Board	District staff has sufficient enforcement authority to quickly address construction site runoff issues.

Carpinteria Unified School District (CUSD) Table 5.4 Construction Site Runoff Control

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.4B Site Plan Review and Plan Check: Address Construction Runoff Before Runoff Begins	Developing a review process for construction plans before construction begins enables water quality problems to be avoided.	Develop site plan review procedures. Develop BMPs and implementation procedures for construction sites. Also develop post-construction BMPs, monitoring and maintenance procedures.	Yr. 3: The District will identify appropriate staff and consultants to review plans and develop procedures to develop BMPs and implementation procedures.	Review staff identified and procedures to determine if sites require Storm Water Permit. Construction and post-construction BMPs developed.	Effectiveness measured by site monitoring and inspections documented in Sections 5.4C and Section 5.5. Procedures submitted to Water Board in Annual Report.
5.4C Site Inspection and Enforcement: Ensuring Site Inspection and Monitoring	Proper and consistent inspection of SWPPP measures will help prevent construction site runoff.	Develop site inspection and monitoring procedures compliant with applicable District policies.	Yr. 3: District will hire environmental consultant familiar with the General Permit to assist in developing procedures.	Development and implementation of checklists, reports, daily logs, and violation notification procedures.	How many violations occurred during construction and how quickly were they addressed.
5.4C Site Inspection and Enforcement: Ensuring Site Inspection and Monitoring	Proper and consistent inspection of SWPPP measures will help prevent construction site runoff.	Evolve site inspection and monitoring procedures consistent with local and county ordinances.	Yr. 4: District will implement updated site inspection procedures.	Update checklists, reports, daily logs, and violation notification procedures.	How many violations occurred during construction and how quickly were they addressed.

Carpinteria Unified School District (CUSD) Table 5.4 Construction Site Runoff Control

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.4D Pubic Hotline: Allow Public To Report Construction Site Runoff Violations	A hotline promotes public input and assists the District with enforcement of construction site runoff.	Hotline will be established going directly to site inspectors.	Yr. 1: Establish and maintain the public complaint hotline.	Hotline is operational and hotline signage is posted at construction sites.	Time lapsed between a hotline complaint and its resolution.

5.5 Post Construction Storm Water Management in New Development and Redevelopment.

Post-construction storm water management in areas undergoing new development or redevelopment is necessary because runoff from these areas has been shown to significantly affect receiving water bodies. Prior planning and design for the minimization of pollutants in post-construction storm water discharges can be a cost-effective approach to storm water quality management.

There are generally two forms of substantial impacts of post-construction runoff. The first is caused by an increase in the type and quality of pollutants in storm water runoff. As runoff flows over areas altered by development, it picks up harmful sediment and chemicals such as oil and grease, pesticides, heavy metals, and nutrients (e.g. nitrogen and phosphorus). These pollutants often become suspended in runoff and are carried to receiving waters, such as lakes, reservoirs, ponds and streams. Once deposited, these pollutants can enter the food chain through small aquatic life, eventually entering the tissues of fish and humans. The second kind of post-construction runoff impact occurs by increasing the quantity of water delivered to the water body during storms. Increased impervious surfaces interrupt the natural cycle of gradual percolation of water through vegetation and soil. Instead, water is collected from surfaces such as asphalt and concrete and routed to drainage systems where large volumes of runoff quickly flow to the nearest receiving water. The effects of this process include stream bank scouring and downstream flooding, which often lead to a loss of aquatic life and damage to property.

CUSD has chosen the following BMPs to meet the General Permit Requirments:

5.5A Post-Construction Program Development

5.5B Post-Construction BMPs

5.5C District Policies

5.5D Inspection and Maintenance

GENERAL PERMIT REQUIREMENTS:

According to the General Permit, the Permittee must:

- Develop, implement, and enforce a program to address storm water runoff from new development
 and re-development projects that disturb greater than or equal to one acre, including projects less
 than one acre that are part of a larger common plan of development or sale, that discharge into
 the Small MS4 by ensuring that controls are in place that would prevent or minimize water quality
 impacts (General Permit, D.2.e.1).
- Develop and implement strategies, which include a combination of structural and/or non-structural BMPs appropriate for your community (General Permit, D.2.e.2).

- Use ordinance or other regulatory mechanism to address post-construction runoff from new
 development and re-development projects to the extent allowable under State of local law. For
 those Small MS4s described in Supplemental Provision E below, the requirements must at least
 include the design standards contained in Attachment 4 of this General Permit or a functionally
 equivalent program that is acceptable to the appropriate RWQCB (General Permit, D.2.e.3).
- Ensure adequate long-term operation and maintenance of BMPs (General Permit, D.2.e.4).

5.5A Post-Construction Program Development

The District will adopt a post-construction program that 1) minimizes water quality impacts resulting from post-construction runoff from new construction and modernization, 2) adopts a combination of structural and/or non-structural BMPs, and 3) provides inspection, maintenance, enforcement policies and procedures. The District will assess existing and soon-to-be-developed ordinances by the City of Carpinteria and the County of Santa Barbara that address storm water runoff quality. The program development schedule is shown in Table 5.5 as BMP measure 5.5A. This program will comply with General Permit requirements D.2.e.1, listed above. The following sections, 5.5B, 5.5C, and 5.5d describe what will be included in this program.

5.5B Post-Construction BMPs

For projects that are equal to or greater than one acre, the District will develop a policy that requires use of EPA post-construction BMPs and BMPs developed in the City of Carpinteria's SWMP. The District will employ CJSeto Support Services to assist in drafting BMP specifications for each construction site and review these plans with the City of Carpinteria to ensure local ordinance compliance. The EPA's Menu of BMPs for Post-Construction is listed below and can be found on the internet at:

http://cfpub.epa.gov/npdes/stormwater/menuofbmps/post.cfm

EPA's Menu of BMPs for Post-Construction Storm Water Management

Ponds	Experimental Practices
Dry extended detention ponds	Alum injection
Wet ponds	On-lot Treatment
Infiltration Practices	On-Lot treatment
Infiltration basin	Better Site Design
Infiltration trench	Buffer zones
Porous pavement	Open space design
Filtration Practices	Urban forestry
Bioretention	Conservation easements
Sand and organic filters	Infrastructure planning
Vegetative Practices	Narrower residential streets
Storm water wetland	Eliminating curbs and gutters

Structural BMPs

Nonstructural BMPs

Grassed swales Grassed filter strip

Runoff Pretreatment Practices

Catch basins/Catch basin insert In-line storage Manufactured products for storm water inlets Green parking
Alternative turnarounds
Alternative pavers
BMP inspection and maintenance
Ordinances for post-construction runoff

The effectiveness of the BMPs used at each post-construction site will be measured as described in Section 5.5D: Inspection and Maintenance. They will be supplemented by additional BMPs offered by the SWMP of the City of Carpinteria. This measure will be completed and incorporated into District Policy by the end of year three, as discussed in the next section. This BMP meets General Permit requirement D.2.e.2, as listed above, and is shown in Table 5.5 under BMP 5.5B.

5.5C District Policies

The District's plan is to address post-construction water runoff control during the initial construction site planning and review stage, as described in Section 5.4B, for all sites equal to or greater than one acre. During the planning and review stage, the post-construction BMPs for each specific construction site will be chosen from the above EPA Menu of BMPs with the assistance of an environmental consulting firm and the City of Carpinteria. Additionally, the procedures for Inspection and Maintenance of post-construction BMPs will be developed to accompany the chosen BMPs. This will result in a unified plan being developed prior to ground being broken. These procedures will be written into the "District Construction Site Policies and Procedures" for adoption by the Governing Board and to ensure enforcement capability by the District.

The effectiveness of the District's post-construction policies will be measured by the Inspection, and Maintenance procedures discussed in Section 5.5D. This policy will be developed and completed by the end of year three, and is described in Table 5.5, BMP 5.5C. This BMP meets General Permit requirement D.2.e.3, as listed above.

5.5D Inspection and Maintenance

To maintain the effectiveness of post-construction storm water control BMPs, regular inspection and maintenance of control measures is essential. Generally, inspection and maintenance of BMPs can be categorized into two groups—expected routine maintenance and non-routine (repair) maintenance. Routine maintenance refers to checks performed on a regular basis to keep the BMP in good working order and aesthetically pleasing. In addition, routine inspection and maintenance is an efficient way to prevent potential nuisance situations (odors, mosquitoes, weeds, etc.), reduce the need for repair maintenance, and reduce the chance of polluting storm water runoff by finding and correcting problems before the next rain.

All storm water BMPs should be inspected for continued effectiveness and structural integrity on a regular basis. Generally, all BMPs should be checked after each storm event in addition to these regularly scheduled inspections. Scheduled inspections will vary among BMPs. Structural BMPs such as storm drain drop inlet protection may require more frequent inspection to ensure proper operation. During each inspection, the inspector should document whether the BMP is performing correctly, any damage to the BMP since the last inspection, and what should be done to repair the BMP if damage has occurred.

The District, with the assistance of an CJSeto Support Services and the City of Carpinteria, will develop inspection and maintenance protocols for each post-construction BMP. This will include developing procedures, logs, schedules, and reports for checking BMPs after storm events, routine maintenance, and non-routine maintenance. It will also include training District personnel to perform simple monitoring and inspections and employing CJSeto Support Services to perform any advanced monitoring and inspections.

The inspections of the BMPs will show the effectiveness of the entire post-construction program. If the BMPs are operating in a healthy way and doing their job, the program is successful. If not, the program and procedures will have to be upgraded to address any problems. By the end of year two, the District will have developed inspection and maintenance protocols along with designations of trained personnel responsible for their enforcement. The effectiveness of this measure will be shown by whether or not all BMPs are functioning as they were designed and the results will be submitted to the Water Board on an annual basis. This BMP is outlined in Table 5.5, item 5.5D, and this section addresses the General Permit requirement D.2.e.4, listed above.

Table 5.5 presents selected BMPs for this minimum measure. The table identifies the name of the BMP, its justification, measurable goals, year it will be implemented, progress measurement, and effectiveness measurement.

Table 5.5 Post-Construction Runoff Control

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.5A Program Development: Develop Comprehensive Program To Address Post-Construction Storm Water Runoff	Developing a comprehensive post-construction site runoff control program will reduce runoff pollutants during the life of new construction/redevelopment projects.	Comprehensive plan which includes the implementation of BMPs 5.5B, 5.5C, 5.5D. It will be consistent with the City of Carpinteria's new and existing storm water ordinances.	Yr. 3: Comprehensive program development using the three BMPs listed below.	Program fully developed and incorporates newly-developed ordinances by the City of Carpinteria.	Visual inspections during and after storm events. Are BMPs effective? Is storm water pollution being properly managed?
5.5B Post- Construction BMPs: Develop Menu of BMPs to Prevent Storm Water Pollution	The use of BMPs for post-construction will help ensure long term reduction of pollutants into receiving waters.	Menu of post- construction BMPs.	Yr. 3: Research post-construction BMPs from regulatory sources such as the EPA and the City of Carpinteria.	Post-construction BMP menu fully developed and tailored to the District's needs.	Visual inspections during and after storm events. Are BMPs effective? Is storm water pollution being properly mitigated?
5.5C District Policies: Planning and Approving Post- Construction BMPs Before Construction Begins	The provisions of a policy governing post-construction measures will help reduce runoff pollutants to receiving water bodies.	Write and adopt a post- construction program to be submitted to District Governing Board.	Yr. 3: Ordinances adopted by the City of Carpinteria should be ready for integration into the District's program.	"District's Construction and Post-Construction Policies and Procedures" adopted by the District Governing Board.	Visual inspections during and after storm events. Are BMPs effective? Is storm water pollution being properly managed?

Table 5.5 Post-Construction Runoff Control

Best Management	Justification	Measurable	Implementation	Progress	Effectiveness
Practice (BMP)		Goal	Schedule	Measurement	Measurement
5.5D Inspection and Maintenance: Keeping BMPs Effective For Their Lifetime	Ensures soil erosion and siltation continue to be prevented long after construction has been completed.	District maintenance crews will be trained to monitor post-construction BMPs to ensure they are clear of debris and functioning as designed.	Yr. 3: Work with CJSeto Support Services to develop checklists, logs, reports, and to train District personnel.	Inspection and maintenance procedures developed and implemented.	Visual inspections during and after storm events. Are BMPs affective? Is storm water pollution being properly managed?

5.6 Pollution Prevention and Good Housekeeping for Facilities Maintenance and Operation

The Pollution Prevention/Good Housekeeping minimum control measure requires the District to examine and subsequently alter the actions of its own forces to help ensure a reduction in the amount and type of pollution that: (1) collects on roads, parking lots, open spaces, and storage and vehicle maintenance areas and is discharged into local waterways; and (2) results from actions such as environmentally damaging land development and flood management practices or poor maintenance of storm sewer systems. While this measure is meant primarily to improve or protect receiving water quality by altering facility operations, it also can result in a cost savings for the District, since proper and timely maintenance of storm sewer systems can help avoid repair costs from damage caused by age and neglect.

The following is a simple breakdown of the responsible forces within the District:

Grounds: 4 people (Grounds Supervisor + 3)

Maintenance: 4 people (Maintenance Supervisor +3) Custodial: 14 people (Custodial Supervisor + 13)

Transportation: 5 people (Transportation Supervisor + 4)

The following are the chosen BMPs for Section 5.6:

5.6A Operations and Maintenance Program

5.6B Training

5.6C SWPPP for Industrial Yard

5.6D. Rainfall Protection: Autoshop and Woodshop Yards

5.6E. Septic Tank Inspections and Pump Out

GENERAL PERMIT REQUIREMENTS:

- Develop and implement a Maintenance and Operations program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from CUSD operations.
- Using training materials that are available from EPA, the State, or other organizations, include
 employee training to prevent and reduce storm water pollution from activities such as park and
 open space maintenance, fleet building maintenance, new construction and land disturbances,
 and storm water system maintenance.

5.6A. Operations and Maintenance Program

The following components will be considered when creating the Operations and Maintenance Program.

- Maintenance Activities, maintenance schedules and long-term inspection procedures for structural and non-structural controls to reduce floatables and other pollutants discharges from the separate storm sewers
- Controls for reducing or eliminating the discharge of pollutants from areas such as roads and
 parking lots, maintenance and storage yards and waste transfer stations. These controls include
 programs that promote recycling, minimize pesticide use, and ensure the proper disposal of
 animal waste.
- Procedures for the proper disposal of waste removed from separate storm sewer systems and areas listed in the number above, including dredge spoil, accumulated sediments, floatables, and other debris.
- 4. Ways to ensure that new flood management projects assess the impacts on water quality and examine existing projects for incorporation of additional water quality protection devices or practices. EPA encourages coordination with flood control managers for the purpose of identifying and addressing environmental impacts from such projects.

The District has a Maintenance and Custodial force of 27 full-time employees responsible for the maintenance of buildings, construction activities, food service operations, grounds maintenance, roads, parking lots, irrigational runoff, litter and debris, loading and unloading areas, outdoor storage of raw materials, painting, roof runoff, sewer line blockages and seepage, trash storage areas, vehicle washing (no washing onsite), utility line maintenance and repairs, pet feces, carpet cleaning waste water, storm drains, parking lots and fields. See Table 5.3a of this Program.

The Operations and Maintenance program is a comprehensive approach to address the multiple facets of the District's operation and maintenance work forces. Best Management Practices will be implemented to cover all Activities/Sources listed in Table 5.3a of this Program. These BMPs will be met through a combination of training and schedules of activities, and prohibitions of practices outlined within this program. Most of the Good Housekeeping BMPs fall under Source Controls and Materials Management. A comprehensive list of actions associated with particular BMPs for Significant Contributors and a BMP Checklist will be made to address Source Control and Materials Management during Year 1, this coincides with Section 5.3 of this Program, 'Illicit Source Survey'.

The Program's effectiveness and progress will be measured by the completion of training (September, annual) and completion of checklist (year 1), completion of BMP details (year 1) and costs associated with each (yearly).

A schedule for cleaning out District storm drains will be developed and implemented by year 2. The schedule will include observations of all major storm drains, including inlets, pipe structures, culverts, outfalls, and basins. The schedule will call for the cleaning of the drains on a case-by-case basis, decided upon during visual observations, when catch basin is found to be clogged. These observations will be done prior to, during and after the rainy season to prevent trash and debris from entering receiving water bodies during storm events. In extreme cases, the District will hire a storm drain cleaning contractor to perform this function. This parameter will be measured by amount of observations (3 minimum) and how many storm drains were cleaned each year.

Years 3-5 will measure progress through maintenance of Year 1 and Year 2 activities and will be reported annually.

5.6B. Training

The District will emphasize training for the "Maintenance Group" listed in BMP1A of this Program. The representative "Maintenance Group" will follow BMPs listed in Table 5.3a of this Program and be trained for each BMP listed. At a minimum, once-a-year training will be provided to the "Maintenance Group" about storm water quality and how their actions can have a direct impact on the District's efforts to reduce pollutant infiltration. Crews will be taught the importance of each individual BMP listed within Table 5.3a, including keeping roads and storm drain systems clean of trash and debris and the proper handling and clean up of maintenance materials. Grounds crews will be educated on the proper and efficient use of fertilizers and pest controls. Maintenance employees will receive training on maintenance and cleaning activities to be performed during overflows. The Progress parameter will be measured by the number and percent of employees that receive training and pass the guiz given at the end of the training.

5.6C. Storm Water Pollution Prevention Plan for Industrial Yard and Street Operations

A Storm Water Pollution Prevention Plan (SWPPP) has been developed and implemented for the District's Transportation Yard. The purpose for the SWPPP is to have a documented plan for controlling runoff from the Transportation Yard and for preventing harmful maintenance debris from entering the storm drain system. This parameter will be measured by the implementation of the SWPPP and preparation of the Annual Report per the Industrial Permit. As part of the Industrial Permit BMPs, the District has halted bus washing on school property, as the addition of a sump was too costly and collecting the rinsate was not practical. The buses are now washed in Santa Barbara at a bus washing facility. The District has coordinated with the City of Carpinteria concerning a possible bus washing site on City property. Subject to funding this site will be composed of a grassy area that will allow for slow percolation of rinsate and the possibility of a sump system.

5.6D. Rainfall Protection: Autoshop and Woodshop Yards

Rainfall protection will function as a structural BMP preventing petroleum products and woodchips from entering the storm water runoff.

The District will meet to discuss an appropriate structural BMP for the Autoshop and Woodshop Yards. These outdoor areas are currently utilized for classroom instruction. The District will implement a temporary or permanent structural BMP to control polluted runoff. The chosen BMP must meet the regulatory standards of OSHA, RWQCB and other applicable state and District policies.

5.6E. Septic Tank Inspections and Pump Out

As stated in Section 2.1 the District owns rental property known as the "Bailard Property". This property contains 2 new septic tanks, installed in 2002.

The District will adhere to a Septic Tank Inspection and Pump Out schedule of every 3-4 years with the County Sanitation for the Bailard Property. The next scheduled inspection and pump out will be August-October 2005.

Table 5.6 presents selected BMPs for this minimum measure. The table identifies the name of the BMP, its justification, measurable goals, year it will be implemented, progress measurement, and effectiveness measurement.

Table 5.6 Pollution Prevention/Good Housekeeping

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5. 6A Operations and Maintenance Program	BMP Implementation is the key to Illicit Source Control.	Best Management Practices will be implemented to cover key Source Acitivities listed in Table 5.3a of this Program. Any Source Activities not identified in Table 5.3a will be added to the comprehensive list.	Yr. 1: Create comprehensive BMP list of Significant Contributors after first training with "Maintenance Group", create BMP checklist to facilitate tracking of BMP Implementation. Create observation sheet and protocol.	Completion of comprehensive BMP list after first training with "Maintenance Group", completion of BMP checklist to facilitate tracking of BMP Implementation.	Cost Analysis of creation of the comprehensive list, checklist use, comprehensive list of Significant Contributors BMPs and less direct pollution into the storm sewer system.
5.6A Operations and Maintenance Program	BMP Implementation is the key to Illicit Source Control.	Best Management Practices will be implemented to cover key Source Acitivities listed in Table 5.3a of this Program.	Yr. 2-5: Implement chosen Significant Contributor BMPs per schedule created in year 1. Drains cleared as needed.	BMP list from Year 1 utilized Checklist from Year 1 utilized All BMPs in place.	BMP list from Year 1 maintained Checklist maintained Reduction of less direct pollution into the storm sewer system.

Table 5.6 Pollution Prevention/Good Housekeeping

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.6B Training	The District will emphasize training for "Maintenance Group".	Training will be provided to the "Maintenance Group" about storm water quality and how their actions can have a direct impact on the District's efforts to reduce pollutant infiltration.	Yr. 1: Maintenance Group will be trained in September about the Source / Activity BMP list and aid in the creation of the Significant Contributors.	The number and percent of employees that receive training.	After receiving training, staff will be given written quiz to evaluate effectiveness of training.
5.6B Training	The District will emphasize training for "Maintenance Group".	Training will be provided to the "Maintenance Group" about storm water quality and how their actions can have a direct impact on the District's efforts to reduce pollutant infiltration.	Yr. 2-5: Maintenance Group will be trained in September about the Source / Activity BMP list.	The number and percent of employees that receive training.	After receiving training, staff will be given written quiz to evaluate effectiveness of training.

Table 5.6 Pollution Prevention/Good Housekeeping

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.6C Storm Water Pollution Prevention Plan for Transportation Yard	To have a documented plan for controlling runoff from the Transportation Yard and for preventing harmful maintenance debris from entering the storm drain system.	Controlling runoff and preventing harmful maintenance debris from entering the storm drain system.	Yr. 1: MonitoredMonthly and Sampled during the rainy season (October through May) and Quarterly for authorized and unauthorized discharges, Annual Report and Annual Compressive Site Compliance Evaluation submitted to the RWQCB yearly.SWPPP updated yearly.	The implementation of the SWPPP and preparation of the Annual Report per the Industrial Permit.	All reports filed according to schedule. If sample analyses reflect illicit discharges beyond threshold levels (EPA), BMPs will be evaluated and restructured until the problem is resolved.
5.6C Storm Water Pollution Prevention Plan for Transportation Yard	To have a documented plan for controlling runoff from the Transportation Yard and for preventing harmful maintenance debris from entering the storm drain system.	Controlling runoff and preventing harmful maintenance debris from entering the storm drain system.	Yr. 2-5: Monitored Monthly and Sampled during the rainy season (October through May) and Quarterly for authorized and unauthorized discharges, Annual Report and Annual Compressive Site Compliance Evaluation submitted to the RWQCB yearly. SWPPP updated yearly.	The implementation of the SWPPP and preparation of the Annual Report per the Industrial Permit.	All reports filed according to schedule. If sample analyses reflect illicit discharges beyond threshold levels (EPA), BMPs will be evaluated and restructured until the problem is resolved.

Table 5.6 Pollution Prevention/Good Housekeeping

Best Management Practice (BMP)	Justification	Measurable Goal	Implementation Schedule	Progress Measurement	Effectiveness Measurement
5.6D Rainfall Protection for Autoshop/Woodshop yards	Rainfall protection will function as a structural BMP preventing petroleum products and woodchips from entering the storm water runoff.	Employ overhead protection to keep storm water away from Autoshop and Woodshop Yards.	Yr. 1: Meet with Maintenance Supervisor to create a feasible structural BMP. This BMP must meet all OSHA, RWQCB and District Policies. Yr 3: Implement structural BMP.	Assure the BMP is thoroughly researched, meets regulatory standards and is affordable to the District. Employ BMP year 3.	Once BMP is installed and runoff is diverted, assure runoff to nearby drain is free of sheen and woodchips through visual observation during rain events.
5.6E Septic Tank Inspections and Sump Pump Out	Control underground leaching of sewage.	Maintain a 3-4 year schedule of septic tank inspection and pump out beginning 2005.	Yr. 1: Inspect and Pump tank 2005 using County Sanitation services. Yr. 4 or Yr. 5: Inspect and Pump tank 2008- 09 using County Sanitation services.	Tanks are Inspected and Pumped on schedule.	Record will be kept of inspection and pump-out.

6.0 RECORD KEEPING

6.1 <u>SWMP UPDATING</u>

The SWMP will be reviewed annually and updated whenever changes in activities or operations occur that may significantly affect the discharge of storm water pollutants.

6.2 SWMP PUBLIC ACCESS

This SWMP is a public document and is intended for use by CUSD students, faculty, and staff. A copy of the SWMP will be available for viewing and downloading at the District's storm water website [http://www.cusd.net/home/], which is linked to www.cjseto.com/stormwater (or a similar CJSeto address).

6.3 SWMP ANNUAL REPORTS AND RECORD KEEPING TIMELINE

CUSD will submit an annual report to the Regional Water Quality Control Board (RWQCB), Central Coast Region 3, by September 15th of each year beginning the first year after acceptance of this Program, for the life of the permit. The first submission was April 30, 2005. This revision was submitted by May 17, 2005.

Following acceptance by the RWQCB, the Plan will be revised on a yearly basis following the District's fiscal year of July 1st through June 30th. A draft revised program will be prepared by CJSeto Supoprt Services and Staff by February 15th for budget consideration. The updated plan will begin implementation by July 1st of that year.

Annual reports will be submitted to the Central Coast Regional Water Quality Board by September 15th of each year with the first report to be submitted, most likely, by September 15, 2006; anticipating that the RWQCB accepts this Program before September 15, 2005.

Activities performed throughout the reporting period of July 1st (or acceptance date) through June 30th will be summarized in the annual report.

The report will summarize the activities performed throughout the reporting period and must include the following:

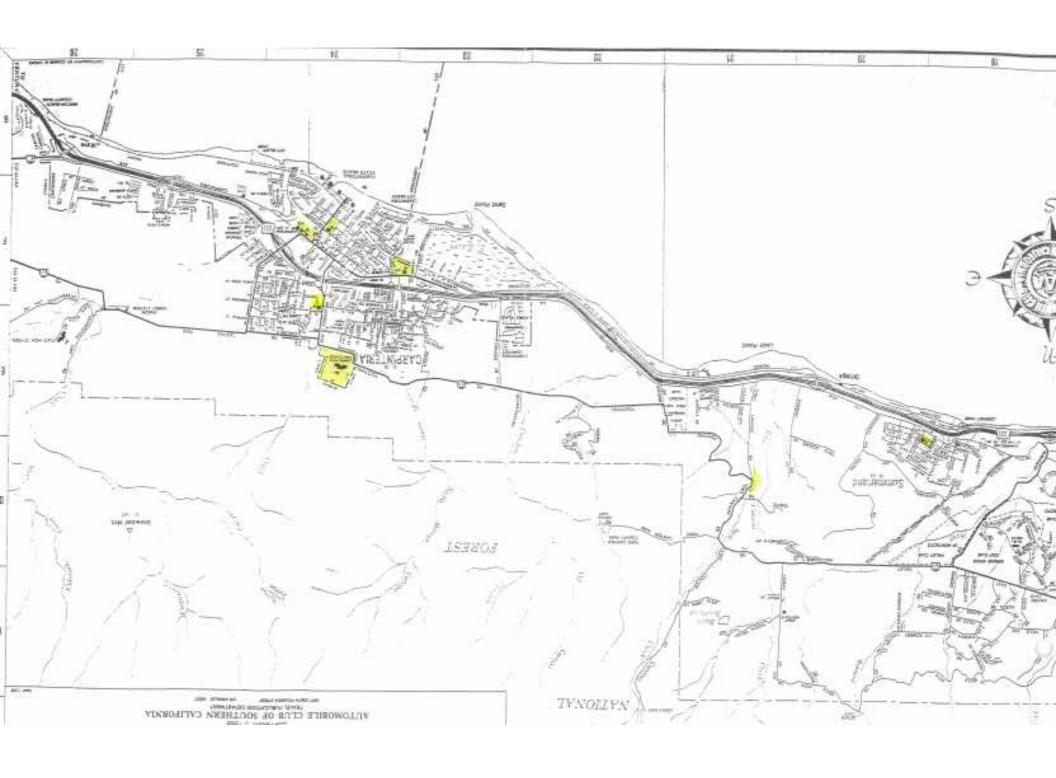
- The status of compliance with permit conditions.
- An assessment of the appropriateness and effectiveness of the identified BMPs.
- Status of the identified measurable goals.

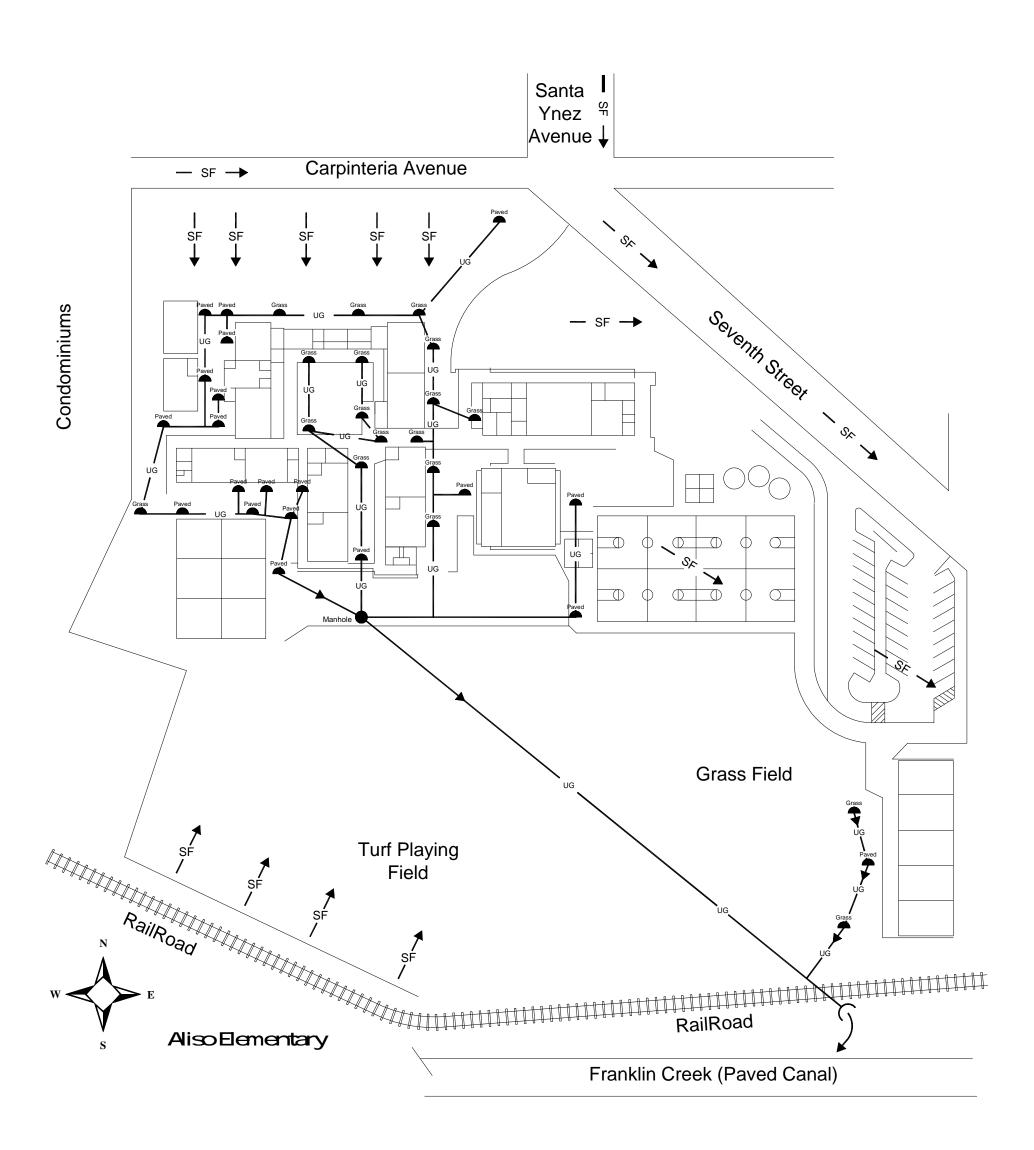
- Results of information collected and analyzed, including monitoring data, if any, during the reporting period.
- A summary of the storm water activities CUSD plans to undertake during the next reporting cycle.
- Any proposed changes to the SWMP along with justification of why the changes are necessary.
- Any change in the person or persons implementing and coordinating the SWMP.

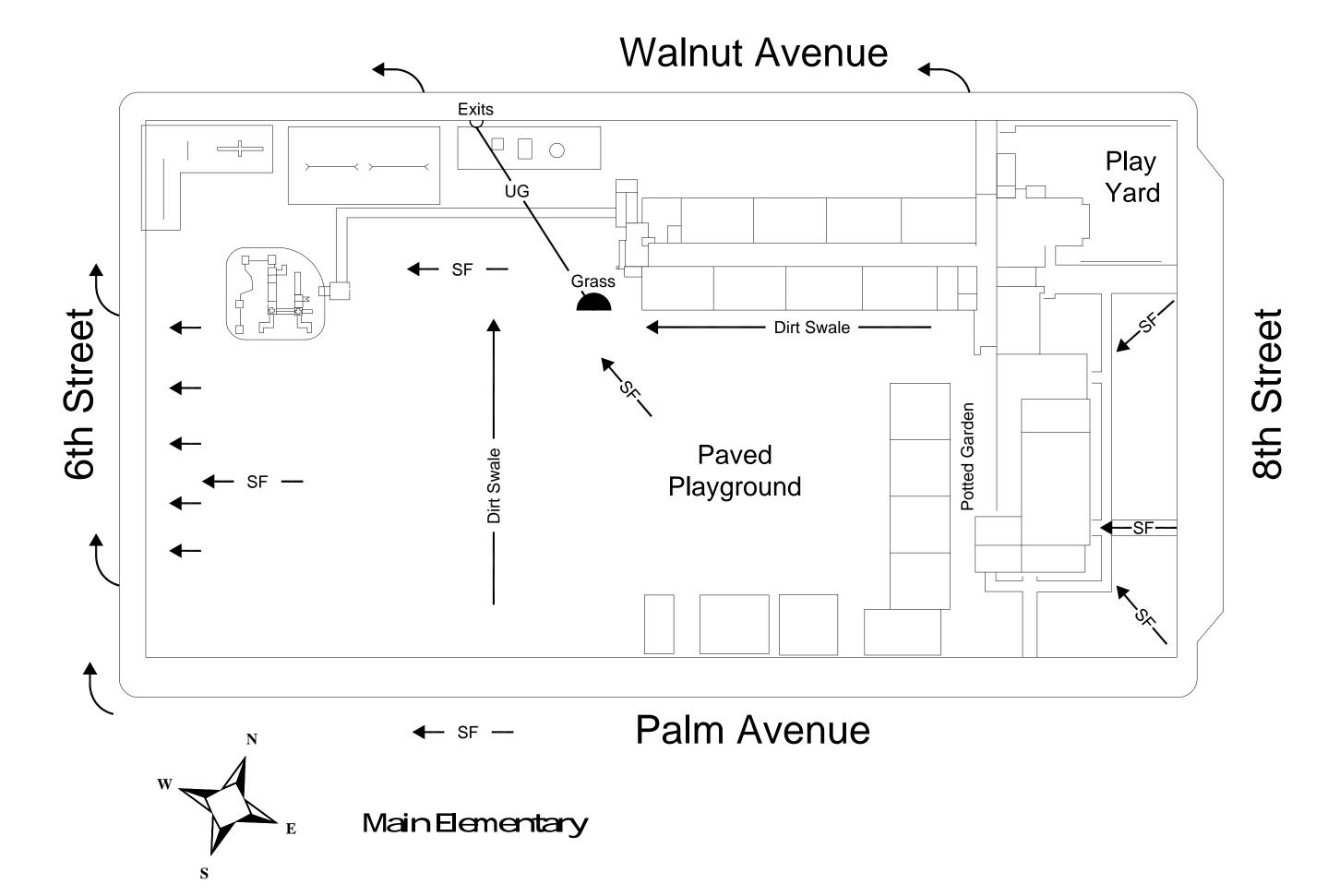
CUSD must keep records required by the General Permit for at least 5 years or the duration of the General Permit, whichever is longer. The RWQCB may specify a longer time for record keeping retention. CUSD must submit the records to the RWQCB upon request. CUSD must also make the records, including the permit and the SWMP, available to the public during regular business hours.

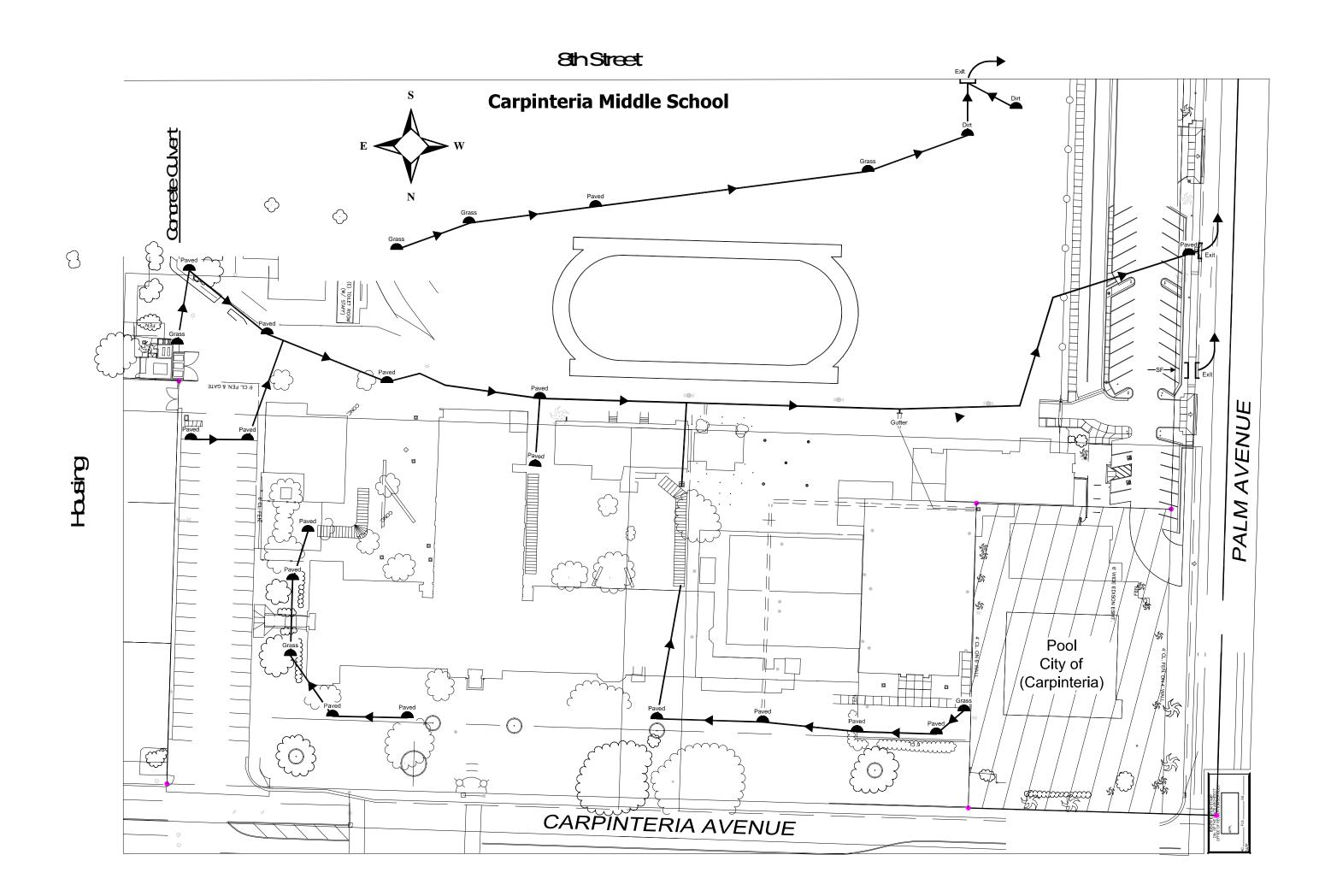
6.4 SWMP NONCOMPLIANCE REPORTING

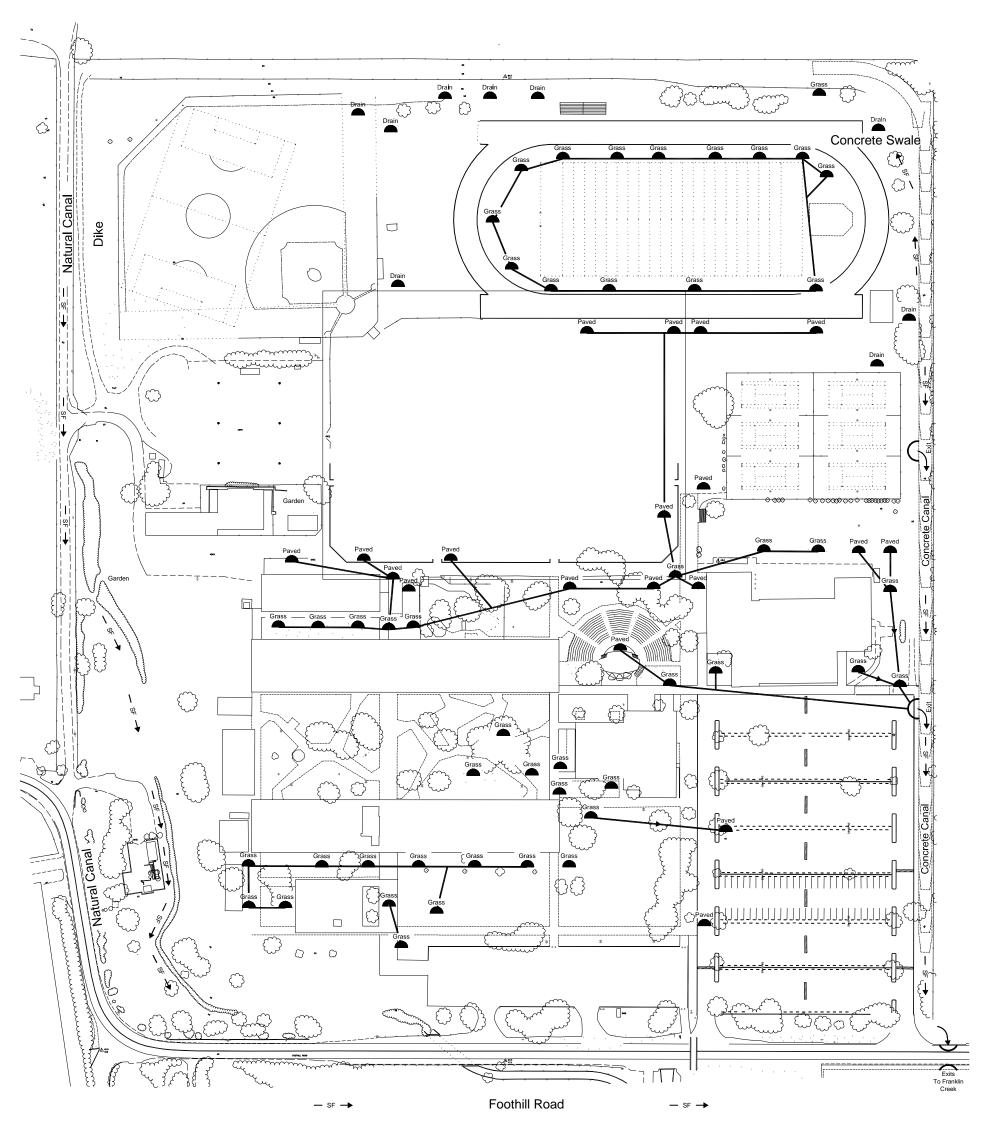
Permittees who cannot certify compliance and/or who have had other instances of noncompliance shall notify the appropriate RWQCB within 30 days. Instances of noncompliance resulting in emergencies (i.e., that endanger human health or the environment) shall be reported orally to the RWQCB within 24 hours from the time the discharger becomes aware of the circumstance and in writing to the RWQCB within five days of the occurrence. The notification shall identify the noncompliance event and an initial assessment of any impact caused by the event, describe the actions necessary to achieve compliance, and include a time schedule indicating when compliance will be achieved. The time schedule and corrective measures are subject to modification by the RWQCB Executive Officer.

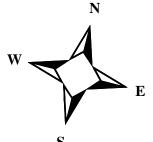




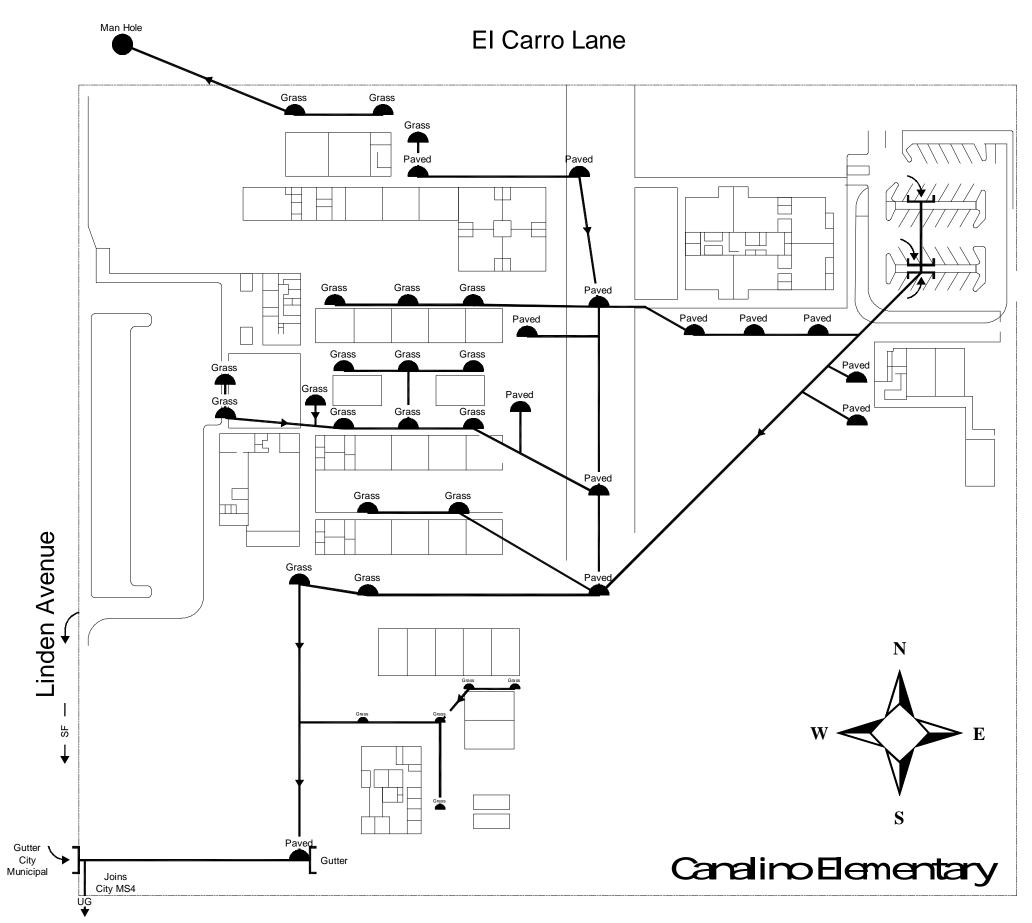






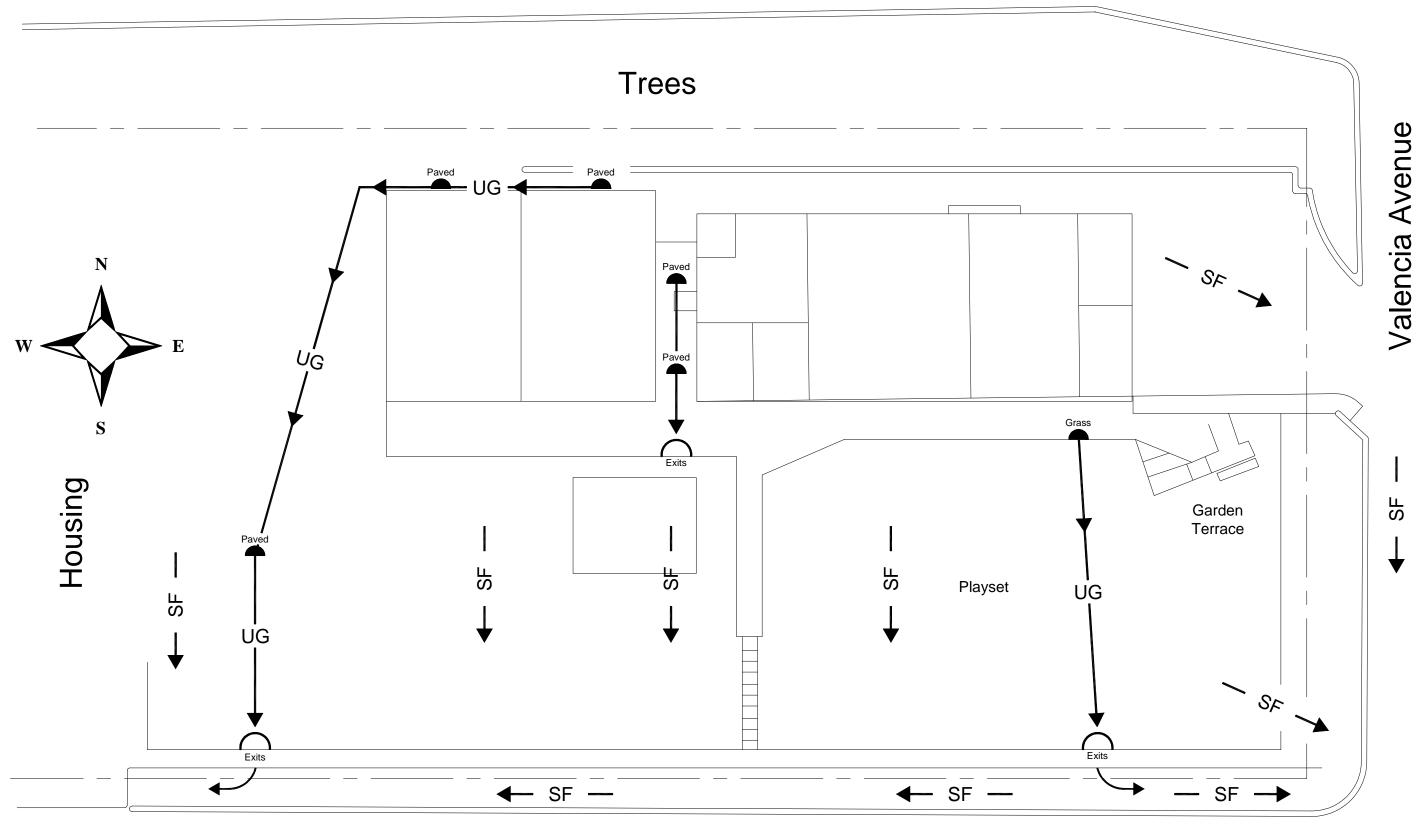


Carpinteria High School



Housing

Banner Avenue



Varley Street